INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 29, 2006

RE: Paoli, Inc. / 117-22829-00014

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTV-PMOD.doc 03/23/06

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Mr. Alan Pielemeier
Director of Safety/Environmental Compliance
Paoli, Inc.
201 East Martin Street
Orleans, IN 47454

September 29, 2006

Re: 117-22829-00014
2nd Significant Permit Modification to
Part 70 Permit No.: T117-6003-00014

Dear Mr. Pielemeier:

Paoli, Inc. was issued a Part 70 operating permit on March 28, 2002 for a stationary wood office furniture manufacturing plant located at 201 East Martin Street, Orleans, IN 47454. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The significant permit modification allows for the operation of several new units and several modified units. A detailed description of the modification and the exact changes to the Part 70 permit are located in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the modified permit.

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

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ERG/BS

Attachments:

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

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

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

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

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

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

Operation Permit No.: T117-6003-00014	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007

1st Administrative Amendment No.: 117-18430-00014, issued February 10, 2004.
2nd Administrative Amendment No.: 117-18980-00014, issued June 10, 2004
3rd Administrative Amendment No.: 117-19590-00014, issued August 10, 2004
1st Permit Review Request No.: 117-16394-00014, issued December 10, 2004
4th Administrative Amendment No.: 117-20071-00014, issued February 18, 2005
2nd Permit Review Request No.: 117-20909-00014, issued April 13, 2005
1st Significant Permit Modification No.: 117-22546-00014, issued May 19, 2006

2nd Significant Permit Modification No.: 117-22829-00014	Pages Affected: 7-12, 33-44, 46
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 29, 2006 Expiration Date: March 28, 2007

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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

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

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

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

Desk Line 1:

(a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.

(b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.

(c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.

(d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.

(f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.

(g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.

(i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.

(j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.

(k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.

(l) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.

(m) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

Desk Line 2:

(n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F15.

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

(p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.

(q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F17.

(r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F19.

(s) One (1) Topcoat #1and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F23.

(t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F22.

(u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F45.

(v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F46.

(w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F47.

(x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.

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

Desk Line 3:

(z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

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

(cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.

(dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.

(ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.

(ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.

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

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

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

Desk Line 4:

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

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

Desk Line 5:

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

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

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

Desk Line 6:

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

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

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

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

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

Drawer Line:

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

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

Chair Line:

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

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

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

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

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

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

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

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

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

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

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

UV Line:

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

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

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

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

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

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

HON Desk Line:

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

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

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

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

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

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

Vertical Line:

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

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

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

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

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

Small Parts Line:

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

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

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

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

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

Desk Line 7:

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

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

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

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

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

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

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

Wood Milling and Assembly Operations:

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

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

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

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

(a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7. [326 IAC 2-7-1(21)(G)(xxix)][326 IAC 6-3-2]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]

(d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(e) Paved and unpaved roads and parking lots with public access.

(f) Other activities with particulate emissions equal to or less than 5 lb/hr or 25 lb/day: Woodworking operations and sawdust storage.

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

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T117-6003-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]

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 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance 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, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 contributes to any violation. The PMPs does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-4-(c)(9) 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 2-7 and any other applicable rules.

(g) 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.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The

Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) In addition to the applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

(1) Condition 8(a) from CP 117-5122-00014, issued on August 26, 1996, limiting the facilities U1, U1A/U1B/U1C/U2, U3, U4, U5, U6, U7, U8, and U9 to less than 3.24 tons of VOC per month has been modified to reflect the fact that booths U7, U8, and U9 were never constructed. Therefore, this limit applies to booths U1, U1A/U1B/U1C/U2, U3, U4, U5, and U6.

(2) Condition 8(b) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Plant lines 1 and 2, consisting of sixteen (16) spray booths (T1-T16), were never constructed.

(3) Condition 8(c) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Line, Off Gun Line, Deskline 2 additions, Conference Table Line additions, Drawer Assembly Line additions, and Chair Line additions were never constructed.

(4) Condition 7 from CP 117-4210-00014, issued on March 28, 1995, listing requirements pursuant to 326 IAC 6-2-4 is not applicable because IDEM, OAQ has determined that the wood-fired boiler B1, was never constructed.

(5) Conditions 12, 13, and 14 from CP 117-9309-00014, issued on March 20, 1998, limiting PM emissions from the Finish Sander, listing compliance requirements for the baghouse controlling emissions from the Finish Sander, and listing monitoring requirements from the Finish Sander's exhaust are not applicable because IDEM, OAQ has determined that the Finish Sander is no longer in operation as it has been removed from the source.

(6) Conditions 4, 9, 10, and 11 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of, limiting emissions from, and requiring monitoring of baghouse DC2 are not applicable because IDEM, OAQ has determined that the baghouse DC2, was never constructed.

(7) Condition 4 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of baghouses DC4 and DC6 is not applicable because IDEM, OAQ has determined that the controlled PM emissions from baghouses DC4 and DC6 are less than the allowable emissions required pursuant to 326 IAC 6-3-2. The baghouse specifications stated in the original construction permit application indicated that the maximum particulate matter (PM) emissions from the woodworking baghouses would exceed the allowable PM emissions pursuant to 326 IAC 6-3-2 (Process Operations). Based on the design outlet grain loadings and air flow rates stated in the original application, the potential PM emissions after control were originally estimated at 32.02 pounds per hour. Pursuant to 326 IAC 6-3, the allowable PM emission rate is 9.145 pounds per hour for a process weight rate of 6,622.65 pounds per hour. Therefore, the outlet grain loadings for baghouses DC4 and DC6 were limited to 0.008 gr/dscf. These limits reduced the PM potential to emit to 9.10 pounds per hour to achieve compliance with the

allowable PM emission rate. Stack testing was required to demonstrate that the reduced outlet grain loadings were not being exceeded at the maximum production rate.

The Office of Air Quality (OAQ) received and reviewed an application from Paoli, Inc. for a permit revision to PSD permit, CP 117-4210-00014, as previously amended by A 117-8544-00014. The application requested removal of the stack testing requirement for two baghouse dust collectors on the woodworking operations, identified as DC4 and DC6.

Removal of the stack test requirements have been approved by the OAQ Compliance Branch, provided that there is a condition that there are no visible emissions from the building openings. This requirement was already included in the original permit. Visible emission notations, quarterly inspection, and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

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

(a) All terms and conditions of permits established prior to T087-14534-00051 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 the "authorized official" 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.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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 Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 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 emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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, OA, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Identification of Emission Units and Stacks [326 IAC 2-7-6]

The Permittee shall maintain an up-to-date plant layout print that clearly identifies the location each spray booth and stack exhaust at the source. The plant layout print, which will be kept at the source, will facilitate compliance determination, inspections, monitoring, and record keeping for each spray booth and exhaust stack.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

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

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

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

C.4 Open Burning [326 IAC 4-1] [326 IAC 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. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 source submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 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.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 have a scale such that the expected normal reading 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 pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 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

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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.17 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a

description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32). ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

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

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

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

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

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and 326 IAC 2-3-1(mm)(2)(A)(3); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

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

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

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

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

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.

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

(4) Any other information that the Permittee deems fit to include in this report:

Reports required in this part shall be submitted to:

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

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.22 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 FACILITY OPERATION CONDITIONS

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

Desk Line 1:

(a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.

(b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.

(c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.

(d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.

(f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.

(g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.

(i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.

(j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.

(k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.

(l) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.

(m) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

Desk Line 2:

(n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F15.

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

(p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F17.

(r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F19.

(s) One (1) Topcoat #1and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F23.

(t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F22.

(u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F45.

(v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F46.

(w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F47.

(x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.

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

Desk Line 3:

(z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

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

(cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.

(dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.

(ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.

(ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

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

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

Desk Line 4:

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

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

Desk Line 5:

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

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

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

Desk Line 6:

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

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

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

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

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

Drawer Line:

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

Chair Line:

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

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

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

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

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

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

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

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

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

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

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

UV Line:

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

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

HON Desk Line:

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

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

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

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

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

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

Vertical Line:

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

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Small Parts Line:

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

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

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

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

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

Desk Line 7:

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

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

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

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

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

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

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

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

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

D.1.1 PM and PM_{10} Emissions Limitations [326 IAC 2-2]

Pursuant to SSM 117-22455-00014,

(a) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM emissions shall be less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM_{10} emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.

(c) The PM emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.154 pounds PM per pound solids applied.

(d) The PM_{10} emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.092 pounds PM_{10} per pound solids applied.

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM_{10} to the modification described in SSM 117-22455-00014.

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

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

(a) Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred and forty-five (445) tons VOC, calculated on a twelve month average rolled on a monthly basis. This usage limit is based upon actual hours of operation and has been determined to serve as the BACT for this source;

(b) Dry filters for overspray control; and

(c) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.

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

(d) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures,

(e) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and

(f) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.

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

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

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

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

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

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12 as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12 as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) Limit VHAP emissions from finishing operations used in conjunction with booths N-1 through N-31 as follows:

(A) Achieve a weighted average VHAP content across all coatings of 0.8 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solids, as applied. Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to 0.8 pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(4) Limit VHAP emissions from contact adhesives used in conjunction with booths N-1 through N-31 as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 0.2 pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed 0.2 pound VHAP per pound solids.

(C) Use a control device to limit emissions to 0.2 pound VHAP per pound solids.

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

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

(1) Operator training courses.

(2) Leak inspection and maintenance plan.

(3) Cleaning and washoff solvent accounting system.

(4) Chemical composition of cleaning and washoff solvents.

(5) Spray booth cleaning.

(6) Storage requirements.

(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(8) Line cleaning.

(9) Gun cleaning.

(10) Washoff operations.

(11) Formulation assessment plan for finishing operations.

(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

Airless Spray Application
Air Assisted Airless Spray Application

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

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

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

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

(a) The source shall operate the control device in accordance with manufacturer's specifications

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

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

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

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

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

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

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC)

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

D.1.9 Particulate Matter (PM) Control

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

D.1.10 Particulate Matter (PM/PM_{10}) Emissions Determination [326 IAC 2-2]

(a) Compliance with Condition D.1.1(a) shall be determined by demonstrating compliance with Condition D.1.1(c).

(b) Compliance with Condition D.1.1(b) shall be determined by demonstrating compliance with Condition D.1.1(d).

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

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

Where:

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

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

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

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

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

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

(a) The Permittee shall conduct performance tests (as described in (b) and (c) below) to demonstrate compliance with Conditions D.1.1 and D.1.10.

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

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

D.1.12 Operator Training Program

The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site.

The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records of:

(1) Material safety data sheets (MSDS) of each coating used by booths F27 and F29 and N-1 through N-31.

(2) The density and weight percent solids of each coating used (as applied) by booths F27 and F29 and N-1 through N-31.

(3) The completed tests required by Condition D.1.11.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) To document compliance with Condition D.1.10, the Permittee shall maintain copies of the training program, the list of trained operators, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(d) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(e) To document compliance with Condition D.1.4(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

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

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

(1) January 1 through June 30.

(2) July 1 through December 31.

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

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

and

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Wood Milling and Assembly Operations:

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

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

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

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

D.2.1 Best Available Control Technology (BACT) Condition

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

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

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

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

The pounds per hour limitation was calculated with the following equation:

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

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

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

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

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

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

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

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the Wood Milling and Furniture Assembly stack exhaust (stacks 4 and 6) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed at the Wood Milling and Furniture Assembly stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

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

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

D.2.7 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the wood milling and furniture assembly stack exhaust when venting to the atmosphere.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:

(1) Weekly records of the pressure during normal operation when venting to the atmosphere; and

(2) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

Woodworking Operations:

(a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7.

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

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

D.3.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

(a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.

(b) The opacity from each baghouse shall not exceed ten percent (10%).

(c) Visible emissions from the baghouse shall be observed daily, when exhausting to the atmosphere, using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

(1) The baghouse shall be inspected.

(2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

Compliance with these limitations will satisfy the requirements of Condition D.3.2 (326 IAC 2-2) and D.3.3 (326 IAC 6-3-2).

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 117-5122-00014, issued on August 26, 1996, the particulate emissions from the woodworking facilities exhausting to stack 7 shall not exceed 5.7 pounds PM per hour and 3.4 pounds PM-10 per hour. This limit is required to limit the potential to emit of PM to less than 25 tons and PM-10 to less than 15 tons, per 12 consecutive month period. Compliance with this limit will satisfy the requirements of 326 IAC 6-3-2.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 the PM emissions from the woodworking facilities exhausting to stack 7 shall not exceed 7.37 pounds PM per hour when operating at a process weight rate of 4,800 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)(DD)]

Pursuant to CP 117-5122-00014, issued on August 26, 1996, and in order to comply with conditions D.3.1, D.3.2 and D.3.3, the baghouse/cyclone combination for PM control shall be in operation and control emissions from the woodworking facilities exhausting to stack 7 at all times that the facilities are in operation.

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

D.3.6 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.3.1(c) are not required, and will be replaced by the following:

(a) Daily visible emission notations of the Woodworking Process 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 at the woodworking operations, 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.3.7 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.3.8 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1(c) and D.3.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust when exhausting to the atmosphere.

(b) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), insignificant sources of particulate matter shall not exceed the allowable PM emission rate based on 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:

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

D.4.2 Particulate Matter (PM) Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the PM emissions from each of the two (2) 2.07 MMBtu/hr natural gas-fired boilers shall not exceed 0.6 pounds per million BTU heat input.

SECTION E.1 PLANTWIDE APPLICABILITY LIMITATION REQUIREMENTS

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

The entire plant site is subject to the Plantwide Applicability Limitation [PAL] requirements described in this E section.

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

Source Wide Emission Limits [326 IAC 2-2.4-7(1)]

E.1.1 Emission limits [326 IAC 2-2.4-7(1)]

Volatile Organic Compounds (VOC) emissions from the entire source shall not exceed 419.5 tons per 12 consecutive month period with compliance determined at the end of each month. This provision does not supersede any other VOC emission limits contained in this permit.

General PAL Requirements [326 IAC 2-2.4-1]

E.1.2 Major New Source Review Applicability [326 IAC 2-2.4-1(c)]

Any physical change in or change in the method of operation of this source is not a major modification for VOC, and not subject to the review requirements of 326 IAC 2-2 provided the actual emissions of VOC from the entire source do not exceed the emission limits in Condition E.1.1 of this permit.

E.1.3 General PAL requirements [326 IAC 2-2.4-7, 326 IAC 2-2.4-8, 326 IAC 2-2.4-9, 326 IAC 2-2.4-10, 326 IAC 2-2.4-11, 326 IAC 2-2.4-15]

(a) The requirements of this E Section become effective on the issuance date of SPM 117-22546-00014, and expire ten years after that issuance date.

(b) If the Permittee applies to renew this PAL at least six months prior to expiration of the PAL, but no earlier than eighteen months prior to the expiration of the PAL, then notwithstanding the expiration date in subsection E.1.3(a), the PAL shall continue to be effective until the revised permit with the renewed PAL is issued. The application must contain the elements described in 326 IAC 2-2.4-3 and 326 IAC 2-2.4-10.

(c) Once this PAL expires, if not otherwise renewed, then the requirements of 326 IAC 2-2.4-9 are applicable.

(d) The requirements for renewing this PAL are described in 326 IAC 2-2.4-10.

(e) The requirements for increasing the emissions limits described in Condition E.1.1 are described in 326 IAC 2-2.4-11.

(f) The requirements applicable to terminating or revoking this PAL are described in 326 IAC 2-2.4-15.

Monitoring Requirements [326 IAC 2-2.4-7(6) & (7)] [326 IAC 2-2.4-12]

E.1.4 Volatile Organic Compound (VOC) Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)] [326 IAC 2-2.4-12]

The Permittee shall determine actual annual emissions of VOC by employing the following techniques:

(a) The Permittee shall calculate VOC emissions (in tons) from all surface coating activities and related operations, each calendar month using mass balance calculations. The monthly VOC emissions are the sum of the VOC emissions from each coating or solvent used during the month. The VOC emissions from each coating or solvent will be

calculated by multiplying the VOC content of a coating or solvent by the amount of that coating or solvent used during the calendar month.

(b) The mass balance calculations described in (a) above shall meet the following requirements:

(1) The Permittee shall provide a demonstrated means of validating the published content of the VOC that is contained in or created by all materials used in or at the emissions units.

(2) Assume that each emission unit emits all of the VOC that is contained in or created by that unit if it cannot otherwise be accounted for in the process.

(3) Where the vendor of a material, which is used in or at an emissions unit, publishes a range of pollutant content from the material, the Permittee must use the highest value of the range to calculate VOC emissions unless the IDEM determines there is site-specific data or a site-specific monitoring program to support another content within the range.

(c) The VOC emissions from the insignificant boilers and heaters shall be calculated using the appropriate AP-42 emission factors and the total heat input capacity or fuel usage of the units.

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

E.1.5 Record keeping requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-13]

(a) The Permittee shall retain a copy of all records necessary to determine compliance with the requirements of this E Section and Condition D.1.1(a), including a determination of each emissions unit's twelve (12) month rolling total emissions, for five years from the date of the record. Those records include, but are not limited to:

(1) The amount and VOC content of each coating material and solvent used at the source. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) The Permittee shall retain a copy of the PAL permit application, any applications for revisions to the PAL, each annual compliance certification as required by Condition B.9 of this permit, and data relied on in the certification for the duration of the PAL plus five years.

E.1.6 Reporting requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-14]

(a) The Permittee shall submit a semi-annual report, containing the information described below, to the address listed in Section C – General Reporting Requirements, within thirty (30) days after the end of the calendar quarter being reported. This report requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The report shall include the following information:

(1) The identification of the owner and operator of the source and the permit number.

(2) Total emissions of VOC, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.4.

(3) All data relied upon, including but not limited to, any quality assurance or quality control data, in determining emissions.

(4) A list of any emissions units modified or added to the major stationary source during the reporting period.

(5) If not previously reported pursuant to another condition in this permit, the number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken.

(b) The procedures for reporting deviations from the requirements of this Section E, and the procedures for reporting emissions in excess of the limit in Condition E.1.1 are described in Condition B.15. A report that describes emissions exceeding the PAL limit shall include the quantity of emissions emitted by the source. This term satisfies the requirements of 326 IAC 2-2.4-14(c).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47454
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014

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:

Phone:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
$ The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
$ The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe: Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

PART 70 OPERATING PERMIT
Semi-Annual Report
VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014
Facilities: All surface coating booths
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinners - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner/Solvent mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

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

PART 70 OPERATING PERMIT
Semi-Annual Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014
Facility: Entire Source
Parameter: Total plantwide VOC emissions
Limit: 419 tons per 12 consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Plantwide VOC Emissions	Plantwide VOC Emissions	Plantwide VOC Emissions
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			

Along with this report, the Permittee shall submit the information required by Condition E.1.6 in a manner consistent with that condition and Section C of the Part 70 permit.

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

Part 70 QUARTERLY REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014
Facility: Spray booths F17 through F26, F44 through F47, G1, and C1 through C12, inclusive
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 37 tons per month (less than 445 tons calculated on a twelve month average rolled on a monthly basis)

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Part 70 Permit

Source Background and Description

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

On July 11, 2006, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in The Paoli-New Republican of Orleans, Indiana stating that Paoli, Inc. ("Paoli") had applied for a source modification and permit modification to its Part 70 Permit relating to the construction of 31 surface coating booths and an increase in the production capacity of two (2) booths. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

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

Comment 1:

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

Response to Comment 1:

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

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

Comment 2:

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

(1) Revise Condition D.1.1 to remove the transfer and collection efficiency requirements. Instead, include the following practically-enforceable emission limits: 0.154 lb PM per lb of solids applied and 0.092 lb PM10 per lb of solids applied.

(2) Revise Condition D.1.10 by removing the compliance equation and include a statement that compliance with Condition D.1.1 will be determined by demonstrating that emissions do not exceed the aforementioned emission rates.

(3) Revise Condition D.1.11 to require periodic emissions testing to demonstrate compliance with the aforementioned emission rates.

(4) Revise Condition D.1.13 to match the aforementioned revisions.

Response to Comment 2:

The OAQ has decided to make the following changes to the permit in order to replace existing limits for practically-enforceable emission limits and permit conditions. Note that the supporting data and emission calculations included in Appendix A to the TSD have not been changed. However, a few calculations have been added to Appendix A to show the derivation of the 0.154 and 0.092 lb PM/PM_{10} per pound solids emission limitations.

D.1.1 PM and PM_{10} Emissions Limitations [326 IAC 2-2]

Pursuant to SSM 117-22455-00014,

(a) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM emissions shall be less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM_{10} emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.

(c) ~~The transfer efficiency of booths F27, F29 and N-1 through N-31 shall not be less than 65%.~~ **The PM emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.154 pounds PM per pound solids applied.**

(d) ~~The control efficiency of the dry filters used by booths F27, F29 and N-1 through N-31 shall not be less than 90%.~~ **The PM_{10} emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.092 pounds PM_{10} per pound solids applied.**

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM_{10} to the modification described in SSM 117-22455-00014.

D.1.10 Particulate Matter (PM/PM_{10}) Emissions Determination [326 IAC 2-2]

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

~~PM/PM_{10} = CU x D x W%S x (1 – TE/100) x (1 – CE/100) x 1/2000~~

~~Where:~~

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

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

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

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

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

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

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

(a) Compliance with Condition D.1.1(a) shall be determined by demonstrating compliance with Condition D.1.1(c).

(b) Compliance with Condition D.1.1(b) shall be determined by demonstrating compliance with Condition D.1.1(d).

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

PM/PM_{10} = 1/D x 1/W%S x ER

Where:

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

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

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

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

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

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

(a) The Permittee shall conduct performance tests (as described in (b) and (c) below) to ~~verify the transfer efficiency and particulate matter control efficiency requirements in Conditions D.1.1(c) and D.1.1(d).~~ **demonstrate compliance with Conditions D.1.1 and D.1.10.**

(b) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct ~~transfer efficiency~~ **PM** testing on ~~seven (7)~~ **five (5)** ~~of the~~ **representative** booths covered by Condition D.1.1. **Representative booths**

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

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

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records **of:** ~~in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM/PM_{10} emission limits established in Condition D.1.1.~~

(1) ~~The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and m~~Material safety data sheets (MSDS) ~~necessary to verify the type and amount used~~ **of each coating used by booths F27 and F29 and N-1 through N-31.**

(2) The density and weight percent solids of each coating ~~material~~ used (as applied) **by booths F27 and F29 and N-1 through N-31**.

(3) The completed tests required by Condition D.1.11.

…

D.1.14 Reporting Requirements

~~(a) A quarterly summary of the monthly PM/PM_{10} emissions from the booths covered by Condition D.1.1 as calculated by Condition D.1.10. The summary shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

(~~c~~**b**) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

(1) January 1 through June 30.

(2) July 1 through December 31.

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

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

and

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

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

~~Part 70 QUARTERLY REPORT~~

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

~~YEAR: _____~~

~~Month~~	~~PM/PM_{10} Emissions~~ ~~This Month~~	~~PM/PM_{10} Emissions~~ ~~Previous 11 Months~~	~~PM/PM_{10} Emissions~~ ~~12 Month Total~~
~~Month 1~~			
~~Month 2~~			
~~Month 3~~			

~~No deviation occurred in this quarter.~~

~~Deviation/s occurred in this quarter.~~
~~Deviation has been reported on: _____~~

~~Submitted by: _____~~
~~Title / Position: _____~~
~~Signature: _____~~

~~Date:~~
~~Phone:~~

~~Attach a signed certification to complete this report.~~

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

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

2. 326 IAC 9-1-2 is SIP-approved and therefore federally enforceable. The following change was made to reflect this:

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

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

Existing Approvals

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

(a) AA 117-18430-00014, issued February 10, 2004;

(b) AA 117-18980-00014, issued June 10, 2004;

(c) AA 117-19590-00014, issued August 10, 2004;

(e) Applicability Determination 117-16394-00014, issued December 10, 2004;

(f) AA 117-20071-00014, issued February 18, 2005;

(g) Review Request 117-20909-00014, issued April 13, 2005; and

(h) SPM 117-22546-00014, issued May 19, 2006.

County Attainment Status

The source is located in Orange County.

Pollutant	Status
PM_{10}	Attainment
$PM_{2.5}$	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are

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

(b) Orange County has been classified as attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions.

(c) Orange County has been classified as attainment or unclassifiable for PM_{10}, SO_2, NO_2, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Less than 100
PM_{10}	Less than 100
SO_2	Less than 100
VOC	Greater than 250
CO	Less than 100
NO_x	Less than 100

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) These emissions are based upon the emissions information contained in the TSD for T117-6003-00014 on March 28, 2002.

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

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

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

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM_{10}	Not reported
SO_2	Not reported
VOC	266
CO	Not reported
NO_x	Not reported
HAP	Not reported

Background and Description of Source and Permit Modification

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

(a) To correct several listed production capacities for booths in Desk Line 2. The booths in Desk Line 2 will not be modified. The revisions update the permit so it accurately lists the correct capacities.

(b) To increase the capacity of the existing booths in Desk Line 3 (booths F27 and F29).

(c) For the construction of thirty-one (31) new surface coating booths (N-1 through N-31). These booths will be used to modify and expand the existing Desk Line 3 and create four (4) new surface coating lines identified as the HON Desk Line, Vertical Line, Small Parts Line and Desk Line 7. A description of the booths is as follows:

Desk Line 3:

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

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

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

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

(5) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.

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

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

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

HON Desk Line:

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

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

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

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

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

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

Vertical Line:

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

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

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

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

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

Small Parts Line:

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

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

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

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

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

Desk Line 7:

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

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

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

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

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

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

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

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

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A for emission calculations.

Stack Summary

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

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

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

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

Pollutant	Potential To Emit (tons/year)
PM	56.9
PM_{10}	56.9
SO_2	0
VOC	793
CO	0
NO_x	0

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

Pursuant to 326 IAC 2-7-10.5(f)(4), this source modification requires a Significant Source Modification because the PM, PM_{10} and VOC PTE of the new units is greater than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification pursuant to 326 IAC 2-7-12(d)(1), because the permit modification incorporates a case-by-case limitation (for PM/PM10) in order to render the requirements of 326 IAC 2-2 not applicable.

Permit Level Determination – PSD or Emission Offset

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

	Potential to Emit (tons/year)						
Process/ Emission Unit	PM	PM_{10}	SO_2	VOC	CO	NO_X	Total HAPs
Surface Coating Booths N-1 through N-31 and capacity increase to booths F27 and F29	Less than 25 *	Less than 15 *	0	**	0	0	**
Significant Level or Major Source Threshold	25	15	40	40	100	40	NA

* In order to render the requirements of 326 IAC 2-2 not applicable to this modification, the total PM and PM10 emission from the new surface coating booths and existing booths in Desk Line 3 shall not exceed 25 and 15 tons per year, respectively. See *the State Rule Applicability* section of this document for more information.
** These units are covered by the existing VOC PAL established by SPM 117-22546-00014. Therefore, the VOC emissions from these units are included when determining compliance with that PAL and are not subject to the requirements of 326 IAC 2-2.

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

(a) The VOC emissions from the modification are included under the existing VOC PAL established under 326 IAC 2-2.4;

(b) The total PM/PM10 emissions from the modification have been limited to less than the relevant PSD significant levels (25 and 15 tpy respectively) – see the *State Rule Applicability* section of this document for more information; and

(c) The SO2, CO, and NOx emissions from the modification are less than the respective PSD significant levels (40, 100 and 40 tpy respectively).

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

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

Federal Rule Applicability Determination

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

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

Pursuant to 40 CFR 63.802, the Permittee shall:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations used in conjunction with booths N1 through N31 as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 0.8 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solids, as applied. Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to 0.8 pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives used in conjunction with booths N1 through N31 as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 0.2 pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed 0.2 pound VHAP per pound solids.

(C) Use a control device to limit emissions to 0.2 pound VHAP per pound solids.

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

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

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

(1) Operator training courses.

(2) Leak inspection and maintenance plan.

(3) Cleaning and washoff solvent accounting system.

(4) Chemical composition of cleaning and washoff solvents.

(5) Spray booth cleaning.

(6) Storage requirements.

(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(8) Line cleaning.

(9) Gun cleaning.

(10) Washoff operations.

(11) Formulation assessment plan for finishing operations.

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

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

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

Booths N-1 through N-31 have a PM/PM_{10} PTE (before controls) less than 100 tons per year. Therefore, the requirements of 40 CFR Part 64 do not apply to booths N-1 through N-31 with respect to PM/PM_{10}.

State Rule Applicability Determination

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

326 IAC 2-2 (Prevention of Significant Deterioration)
The uncontrolled PM/PM_{10} PTE of the modification is greater than 25 tons per year and 15 tons per year, respectively. Therefore, in order to render the requirements of 326 IAC 2-2 not applicable to the modification with respect to PM and PM_{10}, controls are required at all times the booths are in operation and the following limits have been established:

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

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

(b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM_{10} emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.

(c) The transfer efficiency of booths F27, F29 and N-1 through N-31 shall not be less than 65%.

(d) The control efficiency of the dry filters used by booths F27, F29 and N-1 through N-31 shall not be less than 90%.

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM_{10} to the modification described in SSM 117-22455-00014.

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

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

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

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

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

(a) The source shall operate the control device in accordance with manufacturer's specifications

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

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

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

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

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

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

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

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

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

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

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

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

Testing Requirements

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

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

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

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

Compliance Determination and Monitoring Requirements

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

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

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

Proposed Changes

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

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

. . .

Desk Line 2:

(n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F15.

(o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.

(q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F17.

(r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F19.

(s) One (1) Topcoat #1and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F23.

(t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F22.

(u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F45.

(v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of ~~7~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F46.

(w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F47.

(x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

(z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

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

(cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.

(dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.

(ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.

(ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.

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

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

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

Desk Line 4:

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

(~~cc~~ **kk**) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Desk Line 5:

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

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

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

Desk Line 6:

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

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

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

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

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

Drawer Line:

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

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

Chair Line:

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

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

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

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

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

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

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

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

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

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

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

UV Line:

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

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

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

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

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

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

HON Desk Line:

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

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

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

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

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

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

Vertical Line:

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

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

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

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

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

Small Parts Line:

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

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

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

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

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

Desk Line 7:

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

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

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

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

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

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

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

Wood Milling and Assembly Operations

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

. . .

Desk Line 2:

(n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F15.

(o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25

SECTION D.1 FACILITY OPERATION CONDITIONS

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

units per hour, emissions controlled by a dry filter, exhausting to stack F10.

(q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F17.

(r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F19.

(s) One (1) Topcoat #1and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F23.

(t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F22.

(u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F45.

(v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of ~~7~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F46.

(w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F47.

(x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of ~~14~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

(z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

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

(cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.

(dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.

(ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.

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

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

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

Desk Line 4:

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

(~~cc~~ **kk**) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Desk Line 5:

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

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

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

Desk Line 6:

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

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Drawer Line:

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

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

Chair Line:

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

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

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

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

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

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

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

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

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

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

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

UV Line:

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

U1C, or U2.

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

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

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

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

HON Desk Line:

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

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

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

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

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

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

Vertical Line:

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

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

(uuu) One (1) Paint Booth, identified as N-17, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters,

SECTION D.1 FACILITY OPERATION CONDITIONS

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

exhausting to stack N-17.

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

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

Small Parts Line:

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

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

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

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

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

Desk Line 7:

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

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

exhausting to stack N-29.

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

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

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

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

D.1.1 PM and PM_{10} Emissions Limitations [326 IAC 2-2]

Pursuant to SSM 117-22455-00014,

(a) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM emissions shall be less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM_{10} emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.

(c) The transfer efficiency of booths F27, F29 and N-1 through N-31 shall not be less than 65%.

(d) The control efficiency of the dry filters used by booths F27, F29 and N-1 through N-31 shall not be less than 90%.

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM_{10} to the modification described in SSM 117-22455-00014.

D.1.~~1~~**2** VOC BACT [326 IAC 2-2-3(a)]

…

D.1.~~2~~ **3** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

…

D.1.~~3~~ **4** Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR ~~63.800~~ **63.802**, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations **used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12** as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives **used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12** as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) Limit VHAP emissions from finishing operations used in conjunction with booths N-1 through N-31 as follows:

(A) Achieve a weighted average VHAP content across all coatings of 0.8 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solids, as applied. Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to 0.8 pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(4) Limit VHAP emissions from contact adhesives used in conjunction with booths N-1 through N-31 as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 0.2 pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed 0.2 pound VHAP per pound solids.

(C) Use a control device to limit emissions to 0.2 pound VHAP per pound solids.

(~~3~~ **5**) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

. . .

D.1.~~4~~**5** Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

…

D.1.~~5~~**6** Particulate Matter (PM) [326 IAC 6-3-2]

…

D.1.~~6~~**7** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

….

D.1.~~7~~**8** Volatile Organic Compounds (VOC)

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

D.1.~~8~~**9** Particulate Matter (PM) Control

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

D.1.10 Particulate Matter (PM/PM_{10}) Emissions Determination [326 IAC 2-2]

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

PM/PM_{10} = CU x D x W%S x (1 – TE/100) x (1 – CE/100) x 1/2000

Where:

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

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

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

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

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

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

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

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

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

(a) The Permittee shall conduct performance tests (as described in (b) and (c) below) to verify the transfer efficiency and particulate matter control efficiency requirements in Conditions D.1.1(c) and D.1.1(d).

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

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

D.1.~~9~~**12** Operator Training Program

…

D.1.~~10~~**13** Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM/PM_{10} emission limits established in Condition D.1.1.

(1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used

(2) The density and weight percent solids of each coating material used (as applied).

(~~a~~ **b**) To document compliance with Condition ~~D.1.1~~ **D.1.2**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition ~~D.1.1~~ **D.1.2**.

. . .

(~~b~~ **c**) To document compliance with Condition ~~D.1.9~~ **D.1.12**, the Permittee shall maintain copies of the training program, the list of trained operators, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(~~c~~ **d**) To document compliance with Condition ~~D.1.3~~ **D.1.4**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition ~~D.1.3~~ **D.1.4**.

. . .

(~~d~~ **e**) To document compliance with Condition ~~D.1.3(b)~~ **D.1.4(b)**, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

. . .

(~~e~~ **f**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.~~11~~**14** Reporting Requirements

(a) A quarterly summary of the monthly PM/PM_{10} emissions from the booths covered by Condition D.1.1 as calculated by Condition D.1.10. The summary shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(~~a~~ **b**) A quarterly summary of the information to document compliance with Condition ~~D.1.1~~ **D.1.2** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(~~b~~ **c**) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

(1) January 1 through June 30.

(2) July 1 through December 31.

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

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

and

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

Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Wood Milling and Assembly Operations:

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

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

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

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

Part 70 QUARTERLY REPORT

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

YEAR: _____

Month	PM/PM_{10} Emissions This Month	PM/PM_{10} Emissions Previous 11 Months	PM/PM_{10} Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

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

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

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

…

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

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

…

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

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

…

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

(i) Baseline actual emissions;

(ii) Projected actual emissions;

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

…

…

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

…

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

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

…

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

…

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

…

Conclusion and Recommendation

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

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

Company Name: Paoli, Inc.
Address City IN Zip: 201 East Martin St., Orleans IN 47454
Permit Number: SPM 117-22829-00014
Reviewer: ERG/BS
Date: 3/29/2006

Material	Density (Lb/Gal)	Weight % H20 & Organics	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	**VOC PTE (ton/yr)**	lb VOC/gal solids	Transfer Efficiency (%)	**Un controlled PM PTE (ton/yr)**	Control Efficiency (%)	**Controlled PM PTE (ton/yr)**
SAP STAIN	6.59	99.80%	0.00%	99.80%	0.00%	0.20%	0.03	78.00	6.58	6.58	17.53	420.62	76.76	3287.71	65%	0.05	90.0%	0.01
NGR STAIN	6.59	99.89%	0.00%	99.89%	0.00%	0.11%	0.05	78.00	6.58	6.58	23.14	555.37	101.36	5983.05	65%	0.04	90.0%	0.00
WIPE STAIN	7.84	83.57%	0.00%	83.57%	0.00%	12.34%	0.01	78.00	6.55	6.55	5.62	134.91	24.62	53.09	65%	1.69	90.0%	0.17
SEALER	7.59	82.51%	0.00%	82.51%	0.00%	17.49%	0.07	78.00	6.26	6.26	33.21	797.13	145.48	35.80	65%	10.79	90.0%	1.08
CATALYST	9.09	48.96%	0.00%	48.96%	0.00%	51.04%	0.00	78.00	4.45	4.45	0.35	8.33	1.52	8.72	65%	0.55	90.0%	0.06
WASHCOAT	6.92	93.79%	0.00%	93.79%	0.00%	6.21%	0.06	78.00	6.49	6.49	28.76	690.19	125.96	104.55	65%	2.92	90.0%	0.29
TOPCOAT	7.84	73.13%	0.00%	73.13%	0.00%	26.86%	0.16	78.00	5.73	5.73	72.53	1740.65	317.67	21.34	65%	40.85	90.0%	4.09
											TOTAL		**793.37**			**56.91**		**5.69**

METHODOLOGY

Note that emission calculations are based on the use of the coatings that produce the worst emissions.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential to Emit VOC (ton/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential to Emit PM (ton/yr) = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

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

Appendix A: Emission Calculations
HAP Emission Calculations from Surface Coating

Company Name: Paoli, Inc.
Address City IN Zip: 201 East Martin St., Orleans IN 47454
Permit Number: SPM 117-22829-00014
Reviewer: ERG/BS
Date: 3/29/2006

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

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

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