



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: January 30, 2007
RE: Kountry Wood Products, LLC / 039-23644-00518
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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 impracticable 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.



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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

January 30, 2007

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Ola Yoder
Kountry Wood Products, LLC
500 E Wabash Avenue
Nappanee, Indiana 46550

Re: New Source Review (NSR) and Part 70
Operating Permit No. T039-23644-00518

Dear Ola Yoder :

Kountry Wood Products, LLC was issued a renewed Federally Enforceable State Operating Permit (FESOP) No. 039-20347-00518 on September 22, 2006 for a stationary wood processing and finishing plant (kitchen cabinet manufacturing) located at 500 E Wabash Avenue, Nappanee, Indiana 46550. The Office of Air Quality (OAQ) received an application from the source on September 14, 2006, relating to construction and operation of a new automated cabinet finishing line at the source, a change in the operation of existing Spray Booth 2 to be a backup spray booth coating a maximum of 50 wood cabinet door fronts per hour, and removal of Spray Booth 1 from the source.

Pursuant to 326 IAC 2-7, the following emission units are approved for construction at the source:

- (a) one (1) automated cabinet finishing line, approved for construction in 2006, including the following equipment:
 - (1) one (1) stain line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) infra red pre-heater exhausting through stack SL1;
 - (B) one (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
 - (C) one (1) stain wipe machine, exhausting through Stack SL3; and
 - (D) two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.
 - (2) one (1) sealer line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) infra red pre-heater exhausting through stack SLE1;
 - (B) one (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (C) one (1) sealer flash oven, exhausting through Stack SLE3; and
 - (D) one (1) electric oven to aid in the drying process, exhausting through Stack SLE4.

- (3) one (1) topcoat line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) scuffer/denibber, with insignificant particulate emissions, exhausting to the one (1) baghouse and one (1) cyclone;
 - (B) one (1) infra red pre-heater exhausting through stack TL1;
 - (C) one (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (D) one (1) topcoat flash oven, exhausting through Stack TL3; and
 - (E) one (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the new affected source.

- (b) natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr:
 - (1) three (3) natural gas-fired radiant tube heaters, approved for construction in 2006, identified as ISA-1 through ISA-3, each rated at 0.125 MMBtu/hr; and
 - (2) two (2) natural gas-fired radiant tube heaters, approved for construction in 2006, identified as ISA-4 through ISA-5, each rated at 0.150 MMBtu/hr;

The construction of this proposed modification and the operation of the entire source shall be subject to the conditions of the attached New Source Review and Part 70 Permit No. 039-23644-00518. If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-5.1-3(h) and 326 IAC 2-5.1-4. If there are changes to the proposed construction the source cannot operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nathan Bell, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 317-234-3350 or at 1-800-451-6027 (ext 43350).

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ncb

Attachments: Technical Support Document (TSD), Addendum to the TSD, and NSR and Part 70 Operating Permit

cc: File - Elkhart County
U.S. EPA, Region V
IDEM Northern Regional Office
Elkhart County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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New Source Review and Part 70 Operating Permit OFFICE OF AIR QUALITY

**Kountry Wood Products, LLC
500 E Wabash Avenue
Nappanee, Indiana 46550**

(herein known as the Permittee) is hereby authorized to construct and 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.: T039-23644-00518	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 30, 2007 Expiration Date: January 30, 2012

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates stationary wood processing and finishing plant (kitchen cabinet manufacturing).

Responsible Official:	Ola Yoder
Source Address:	500 E Wabash Avenue, Nappanee, Indiana 46550
Mailing Address:	500 E Wabash Avenue, Nappanee, Indiana 46550
General Source Phone Number:	(574) 773-5673
SIC Code:	2434
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source under PSD Rules Major Source under Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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:

- (a) one (1) surface coating spray booth, identified as Spray Booth 2, approved for construction in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered part of the new affected source.

- (b) one (1) automated cabinet finishing line, approved for construction in 2006, including the following equipment:
- (1) one (1) stain line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
- (A) one (1) infra red pre-heater exhausting through stack SL1;
- (B) one (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
- (C) one (1) stain wipe machine, exhausting through Stack SL3; and
- (D) two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.

- (2) one (1) sealer line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) infra red pre-heater exhausting through stack SLE1;
 - (B) one (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (C) one (1) sealer flash oven, exhausting through Stack SLE3; and
 - (D) one (1) electric oven to aid in the drying process, exhausting through Stack SLE4.

- (3) one (1) topcoat line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
 - (B) one (1) infra red pre-heater exhausting through stack TL1;
 - (C) one (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (D) one (1) topcoat flash oven, exhausting through Stack TL3; and
 - (E) one (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the new affected source.

- (c) one (1) woodworking operation, approved for construction in 2000, consisting of various woodworking equipment, with particulate matter emissions controlled by one (1) baghouse and one (1) cyclone.

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) natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr;
 - (1) one (1) natural gas-fired air make-up unit, approved for construction in 2000, having a heat input rate of 3.0 MMBtu/hr;
 - (2) one (1) natural gas-fired air make-up unit, approved for construction in 2000, having a heat input rate of 1.0 MMBtu/hr;
 - (3) nine (9) natural gas-fired process heaters, approved for construction in 2000, each with heat input rate of 0.108 MMBtu/hr, respectively; and
 - (4) one (1) natural gas-fired process heater, approved for construction in 2000, having a heat input rate of 0.24 MMBtu/hr.
 - (5) three (3) natural gas-fired radiant tube heaters, approved for construction in 2006, identified as ISA-1 through ISA-3, each rated at 0.125 MMBtu/hr; and

- (6) two (2) natural gas-fired radiant tube heaters, approved for construction in 2006, identified as ISA-4 through ISA-5, each rated at 0.150 MMBtu/hr;

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)][326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when, prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, T039-23644-00518, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.5 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.6 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.7 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.8 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.9 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.10 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 the "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) The "responsible official" is defined at 326 IAC 2-7-1(34)

B.11 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 April 15 of each year to:

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

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.12 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 extension notification does 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "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.13 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, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

B.14 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 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) 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.

- (c) 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.
- (d) 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.
- (e) 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).
- (f) 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)]
- (g) 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)(8)]

B.15 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 T039-23644-00518 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 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.17 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.18 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-7-5(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.19 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.20 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (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.21 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) 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.22 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)(1), (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 in 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
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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.24 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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, OAQ, 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.25 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.26 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) 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.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)][326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.28 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

C.6 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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.8 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.9 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.10 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 be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.11 Risk Management Plan[326 IAC 2-7-5(12)][40 CFR 68]

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

C.12 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 (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.

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

C.13 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 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.14 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 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/or 326 IAC 2-3-1(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/or 326 IAC 2-3-1(II)) 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/or 326 IAC 2-3-1(mm)(2)(A)(iii); 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.15 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (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/or 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 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/or 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 46204-2251

- (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.16 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Spray Booth 2 and Automated Cabinet Finishing Line

- (a) one (1) surface coating spray booth, identified as Spray Booth 2, approved for construction in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered part of the new affected source.

- (b) one (1) automated cabinet finishing line, approved for construction in 2006, including the following equipment:

- (1) one (1) stain line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:

- (A) one (1) infra red pre-heater exhausting through stack SL1;
- (B) one (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
- (C) one (1) stain wipe machine, exhausting through Stack SL3; and
- (D) two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.

- (2) one (1) sealer line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:

- (A) one (1) infra red pre-heater exhausting through stack SLE1;
- (B) one (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
- (C) one (1) sealer flash oven, exhausting through Stack SLE3; and
- (D) one (1) electric oven to aid in the drying process, exhausting through Stack SLE4.

- (3) one (1) topcoat line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:

- (A) one (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
- (B) one (1) infra red pre-heater exhausting through stack TL1;
- (C) one (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
- (D) one (1) topcoat flash oven, exhausting through Stack TL3; and
- (E) one (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the new affected source.

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

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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

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

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 2-3]

- (a) The total potential to emit VOC from the automated cabinet finishing line, including coating materials and solvents, shall not exceed 99.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 2-3 (Emission Offset) not applicable.
- (b) The total potential to emit VOC from Spray Booth 2, including coating materials and solvents, shall not exceed 99.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the automated cabinet finishing line and Spray Booth 2, shall each be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.4 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 the automated cabinet finishing line and Spray Booth 2 and any control devices.

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

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the automated cabinet finishing line stacks (SL2, SLE2, and TL2) and Spray Booth 2 stacks (S1, S2, and S3) while one or more of the facilities are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this

permit.

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

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limitation established in Condition D.1.2.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) A log of the dates of use;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

D.1.8 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.800, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the automated cabinet finishing line and Spray Booth 2, as specified in Table 1 of 40 CFR 63, Subpart JJ in accordance with schedule in 40 CFR 63 Subpart JJ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

D.1.9 Applicability of Wood Furniture Manufacturing NESHAP Requirements [40 CFR Part 63, Subpart JJ]

The provisions of 40 CFR Part 63, Subpart JJ (National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing) apply to the automated cabinet finishing line and Spray Booth 2. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/wood/riwood.html>.

D.1.10 Wood Furniture Manufacturing Requirements [40 CFR Part 63, Subpart JJ][326 IAC 20-14-1]

Pursuant to CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing, which are incorporated by reference as 326 IAC 20-14-1, for the automated cabinet finishing line and Spray Booth 2, as specified as follows upon startup.

§ 63.800 Applicability.

(a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, §63.2. The owner or operator of a source that meets the definition for an incidental wood furniture manufacturer shall maintain purchase or usage records demonstrating that the source meets the definition in §63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.

(b) A source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to any other provision of this rule, provided that: In the case of paragraphs (b)(1) and (b)(2), finishing materials, adhesives, cleaning solvents and washoff solvents used for wood furniture or wood furniture component manufacturing operations account for at least 90 percent of annual HAP emissions at the plant site, and if the plant site has HAP emissions that do not originate from the listed materials, the owner or operator shall keep any records necessary to demonstrate that the 90 percent criterion is being met. A source that initially relies on the limits and criteria specified in

paragraphs (b)(1), (b)(2), and (b)(3) to become an area source, but subsequently exceeds the relevant limit (without first obtaining and complying with other limits that keep its potential to emit hazardous air pollutants below major source levels), becomes a major source and must comply thereafter with all applicable provisions of this subpart starting on the applicable compliance date in §63.800. Nothing in this paragraph (b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

(1) The owner or operator of the source uses no more than 250 gallons per month, for every month, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). The owner or operator shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month, and upon request submit such records to the Administrator. These records shall be maintained for five years.

(2) The owner or operator of the source uses no more than 3,000 gallons per rolling 12-month period, for every 12-month period, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). A rolling 12-month period includes the previous 12 months of operation. The owner or operator of the source shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month and the total gallons used each previous month, and upon request submit such records to the Administrator. Because records are needed over the previous set of 12 months, the owner or operator shall keep monthly records beginning no less than one year before the compliance date specified in §63.800(e). Records shall be maintained for five years.

(3) The source emits no more than 4.5 Mg (5 tons) of any one HAP per rolling 12-month period and no more than 11.4 Mg (12.5 tons) of any combination of HAP per rolling 12-month period, and at least 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture components.

(c) This subpart does not apply to research or laboratory facilities as defined in §63.801.

(d) Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.

(f) New affected sources must comply with the provisions of this standard immediately upon startup or by December 7, 1995, whichever is later. New area sources that become major sources shall comply with the provisions of this standard immediately upon becoming a major source.

§ 63.801 Definitions.

(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A (General Provisions) of this part.

Adhesive means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. Under this subpart, adhesives shall not be considered coatings or finishing materials. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Administrator means the Administrator of the United States Environmental Protection Agency or his or her authorized representative.

Aerosol adhesive means an adhesive that is dispensed from a pressurized container as a suspension of fine solid or liquid particles in gas.

Affected source means a wood furniture manufacturing facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2, excluding sources that meet the criteria established in §63.800(a), (b) and (c) of this subpart.

Alternative method means any method of sampling and analyzing for an air pollutant that is not a reference or equivalent method but has been demonstrated to the Administrator's satisfaction to, in specific cases, produce results adequate for a determination of compliance.

As applied means the HAP and solids content of the coating or contact adhesive that is actually used for coating or gluing the substrate. It includes the contribution of materials used for in-house dilution of the coating or contact adhesive.

Basecoat means a coat of colored material, usually opaque, that is applied before graining inks, glazing coats, or other opaque finishing materials, and is usually topcoated for protection.

Baseline conditions means the conditions that exist prior to an affected source implementing controls, such as a control system.

Building enclosure means a building housing a process that meets the requirements of a temporary total enclosure. The EPA Method 204E is used to identify all emission points from the building enclosure and to determine which emission points must be tested. For additional information see Guidelines for Determining Capture Efficiency, January 1994. Docket No. A-93-10, Item No. IV-B-1.

Capture device means a hood, enclosed room, floor sweep, or other means of collecting solvent emissions or other pollutants into a duct so that the pollutant can be directed to a pollution control device such as an incinerator or carbon adsorber.

Capture efficiency means the fraction of all organic vapors generated by a process that are directed to a control device.

Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

(1) The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311 (as promulgated in this subpart), or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in §63.805(a));

(2) The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in §63.805 (a)); and

(3) The density, measured by EPA Method 24 or an alternative or equivalent method. Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the affected source in demonstrating compliance with the emission limitations presented in §63.802.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.)

Cleaning operations means operations in which organic HAP solvent is used to remove coating materials or adhesives from equipment used in wood furniture manufacturing operations.

Coating means a protective, decorative, or functional film applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, enamels, inks, and temporary protective coatings. Aerosol spray paints used for touch-up and repair are not considered coatings under this subpart.

Coating application station means the part of a coating operation where the coating is applied, e.g., a spray booth.

Coating operation means those activities in which a coating is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

Coating solids (or solids) means the part of the coating which remains after the coating is dried or cured; solids content is determined using data from the EPA Method 24, or an equivalent or alternative method.

Compliant coating/contact adhesive means a finishing material, contact adhesive, or strippable booth coating that meets the emission limits specified in Table 3 of this subpart.

Contact adhesive means an adhesive that is applied to two substrates, dried, and mated under only enough pressure to result in good contact. The bond is immediate and sufficiently strong to hold pieces together without further clamping, pressure, or airing.

Continuous coater means a finishing system that continuously applies finishing materials onto furniture parts moving along a conveyor. Finishing materials that are not transferred to the part are recycled to a reservoir. Several types of application methods can be used with a continuous coater including spraying, curtain coating, roll coating, dip coating, and flow coating.

Continuous compliance means that the affected source is meeting the emission limitations and other requirements of the rule at all times and is fulfilling all monitoring and recordkeeping provisions of the rule in order to demonstrate compliance.

Control device means any equipment that reduces the quantity of a pollutant that is emitted to the air. The device may destroy or secure the pollutant for subsequent recovery. Includes, but is not limited to, incinerators, carbon adsorbers, and condensers.

Control device efficiency means the ratio of the pollutant released by a control device and the pollutant introduced to the control device.

Control system means the combination of capture and control devices used to reduce emissions to the atmosphere.

Conventional air spray means a spray coating method in which the coating is atomized by mixing it with compressed air and applied at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization. Airless and air assisted airless spray technologies are not conventional air spray because the coating is not atomized by mixing it with compressed air. Electrostatic spray technology is also not considered conventional air spray because an electrostatic charge is employed to attract the coating to the workpiece.

Data quality objective (DQO) approach means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Day means a period of 24 consecutive hours beginning at midnight local time, or beginning at a time consistent with a facility's operating schedule.

Disposed offsite means sending used organic HAP solvent or coatings outside of the facility boundaries for disposal.

Emission means the release or discharge, whether directly or indirectly, of HAP into the ambient air.

Enamel means a coat of colored material, usually opaque, that is applied as a protective topcoat over a basecoat, primer, or previously applied enamel coats. In some cases, another finishing material may be applied as a topcoat over the enamel.

Equipment leak means emissions of VHAP from pumps, valves, flanges, or other equipment used to transfer or apply coatings, adhesives, or organic HAP solvents.

Equivalent method means any method of sampling and analyzing for an air pollutant that has been demonstrated to the Administrator's satisfaction to have a consistent and quantitatively known relationship to the reference method, under specific conditions.

Finishing material means a coating used in the wood furniture industry. Such materials include, but are not limited to, stains, basecoats, washcoats, enamels, sealers, and topcoats.

Finishing operation means those operations in which a finishing material is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

Foam adhesive means a contact adhesive used for gluing foam to fabric, foam to foam, and fabric to wood.

Gluing operation means those operations in which adhesives are used to join components, for example, to apply a laminate to a wood substrate or foam to fabric.

Incidental wood furniture manufacturer means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components.

Incinerator means, for the purposes of this industry, an enclosed combustion device that thermally oxidizes volatile organic compounds to CO and CO₂. This term does not include devices that burn municipal or hazardous waste material.

Janitorial maintenance means the upkeep of equipment or building structures that is not directly related to the manufacturing process, for example, cleaning of restroom facilities.

Lower confidence limit (LCL) approach means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Material safety data sheet (MSDS) means the documentation required for hazardous chemicals by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR Part 1910) for a solvent, cleaning material, contact adhesive, coating, or other material that identifies select reportable hazardous ingredients of the material, safety and health considerations, and handling procedures.

Noncompliant coating/contact adhesive means a finishing material, contact adhesive, or strippable booth coating that has a VHAP content (VOC content for the strippable booth coating) greater than the emission limitation presented in Table 3 of this subpart.

Nonporous substrate means a surface that is impermeable to liquids. Examples include metal, rigid plastic, flexible vinyl, and rubber.

Normally closed container means a container that is closed unless an operator is actively engaged in activities such as emptying or filling the container.

Operating parameter value means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limit.

Organic HAP solvent means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film.

Overall control efficiency means the efficiency of a control system, calculated as the product of the capture and control device efficiencies, expressed as a percentage.

Permanent total enclosure means a permanently installed enclosure that completely surrounds a source of emissions such that all emissions are captured and contained for discharge through a control device. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Recycled onsite means the reuse of an organic HAP solvent in a process other than cleaning or washoff.

Reference method means any method of sampling and analyzing for an air pollutant that is published in Appendix A of 40 CFR part 60.

Research or laboratory facility means any stationary source whose primary purpose is to conduct research and development to develop new processes and products where such source is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Responsible official has the meaning given to it in 40 CFR part 70, State Operating Permit Programs (Title V permits).

Sealer means a finishing material used to seal the pores of a wood substrate before additional coats of finishing material are applied. Special purpose finishing materials that are used in some finishing systems to optimize aesthetics are not sealers.

Solvent means a liquid used in a coating or contact adhesive to dissolve or disperse constituents and/or to adjust viscosity. It evaporates during drying and does not become a part of the dried film.

Stain means any color coat having a solids content by weight of no more than 8.0 percent that is applied in single or multiple coats directly to the substrate. It includes, but is not limited to, nongrain raising stains, equalizer stains, prestains, sap stains, body stains, no-wipe stains, penetrating stains, and toners.

Storage containers means vessels or tanks, including mix equipment, used to hold finishing, gluing, cleaning, or washoff materials.

Strippable spray booth material means a coating that:

(1) Is applied to a spray booth wall to provide a protective film to receive over spray during finishing operations;

(2) That is subsequently peeled off and disposed; and

(3) By achieving (1) and (2) of this definition reduces or eliminates the need to use organic HAP solvents to clean spray booth walls.

Substrate means the surface onto which a coating or contact adhesive is applied (or into which a coating or contact adhesive is impregnated).

Temporary total enclosure means an enclosure that meets the requirements of §63.805(e)(1) (i) through (iv) and is not permanent, but constructed only to measure the capture efficiency of pollutants emitted from a given source. Additionally, any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each natural draft opening. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Thinner means a volatile liquid that is used to dilute coatings or contact adhesives (to reduce viscosity, color strength, and solids, or to modify drying conditions).

Topcoat means the last film-building finishing material that is applied in a finishing system.

Touchup and repair means the application of finishing materials to cover minor finishing imperfections.

VHAP means any volatile hazardous air pollutant listed in Table 2 to Subpart JJ.

VHAP of potential concern means any VHAP from the list in table 6 of this subpart.

Volatile organic compound (VOC) means any organic compound which participates in atmospheric photochemical reactions, that is, any organic compound other than those which the Administrator designates as having negligible photochemical reactivity. A VOC may be measured by a reference method, an equivalent method, an alternative method, or by procedures specified under any rule. A reference method, an equivalent method, or an alternative method, however, may also measure nonreactive organic compounds. In such cases, the owner or operator may exclude the nonreactive organic compounds when determining compliance with a standard. For a list of compounds that the Administrator has designated as having negligible photochemical reactivity, refer to 40 CFR part 51.10.

Washcoat means a transparent special purpose finishing material having a solids content by weight of 12.0 percent by weight or less. Washcoats are applied over initial stains to protect, to control color, and to stiffen the wood fibers in order to aid sanding.

Washoff operations means those operations in which organic HAP solvent is used to remove coating from wood furniture or a wood furniture component.

Wood furniture means any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.

Wood furniture component means any part that is used in the manufacture of wood furniture. Examples include, but are not limited to, drawer sides, cabinet doors, seat cushions, and laminated tops. However, foam seat cushions manufactured and fabricated at a facility that does not engage in any other wood furniture or wood furniture component manufacturing operation are excluded from this definition.

Wood furniture manufacturing operations means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.

(b) The nomenclature used in this subpart has the following meaning:

- (1) A_k = the area of each natural draft opening (k) in a total enclosure, in square meters.
- (2) C_c = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).
- (3) C_{aj} = the concentration of VHAP in gas stream (j) exiting the control device, in parts per million by volume.
- (4) C_{bi} = the concentration of VHAP in gas stream (i) entering the control device, in parts per million by volume.
- (5) C_{di} = the concentration of VHAP in gas stream (i) entering the control device from the affected source, in parts per million by volume.
- (6) C_{fk} = the concentration of VHAP in uncontrolled gas stream (k) emitted directly to the atmosphere from the affected source, in parts per million by volume.
- (7) E = the emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids (lb VHAP/lb solids).
- (8) F = the control device efficiency, expressed as a fraction.

- (9) FV =the average inward face velocity across all natural draft openings in a total enclosure, in meters per hour.
- (10) G =the VHAP content of a contact adhesive, in kg VHAP/kg solids (lb VHAP/lb solids), as applied.
- (11) M =the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).
- (12) N =the capture efficiency, expressed as a fraction.
- (13) Q_{aj} =the volumetric flow rate of gas stream (j) exiting the control device, in dry standard cubic meters per hour.
- (14) Q_{bi} =the volumetric flow rate of gas stream (i) entering the control device, in dry standard cubic meters per hour.
- (15) Q_{di} =the volumetric flow rate of gas stream (i) entering the control device from the emission point, in dry standard cubic meters per hour.
- (16) Q_{fk} =the volumetric flow rate of uncontrolled gas stream (k) emitted directly to the atmosphere from the emission point, in dry standard cubic meters per hour.
- (17) Q_{ini} =the volumetric flow rate of gas stream (i) entering the total enclosure through a forced makeup air duct, in standard cubic meters per hour (wet basis).
- (18) Q_{outj} =the volumetric flow rate of gas stream (j) exiting the total enclosure through an exhaust duct or hood, in standard cubic meters per hour (wet basis).
- (19) R =the overall efficiency of the control system, expressed as a percentage.
- (20) S =the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.
- (21) W =the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.
- (22) a_c =after the control system is installed and operated.
- (23) b_c =before control.

§ 63.802 Emission limits.

(b) Each owner or operator of a new affected source subject to this subpart shall:

- (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this subpart using any of the compliance methods in §63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in §63.803(l)(2) for determining styrene and formaldehyde usage.
- (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in §63.804(e).
- (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

§ 63.803 Work practice standards.

(a) Work practice implementation plan. (1) Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date.

(2) The written work practice implementation plan shall be available for inspection by the Administrator (or delegated State, local, or Tribal authority) upon request. If the Administrator (or delegated State, local, or Tribal authority) determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator (or delegated State, local, or Tribal authority) may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

(3) The inspection and maintenance plan required by paragraph (c) of this section and the formulation assessment plan for finishing operations required by paragraph (l) of this section are also reviewable by the Administrator (or delegated State, local, or Tribal authority).

(b) Operator training course. Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

(1) A list of all current personnel by name and job description that are required to be trained;

(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

(c) Inspection and maintenance plan. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

(2) An inspection schedule;

(3) Methods for documenting the date and results of each inspection and any repairs that were made;

(4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

- (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
- (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- (d) Cleaning and washoff solvent accounting system. Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:
 - (1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 of this subpart;
 - (2) The number of pieces washed off, and the reason for the washoff; and
 - (3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- (e) Chemical composition of cleaning and washoff solvents. Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.
- (f) Spray booth cleaning. Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- (g) Storage requirements. Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- (h) Application equipment requirements. Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - (2) For touchup and repair under the following conditions:
 - (i) The touchup and repair occurs after completion of the finishing operation; or
 - (ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - (4) When emissions from the finishing application station are directed to a control device;

(5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

(6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.

The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

(i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

(i) Line cleaning. Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

(j) Gun cleaning. Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

(k) Washoff operations. Each owner or operator of an affected source shall control emissions from washoff operations by:

(1) Using normally closed tanks for washoff; and

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(l) Formulation assessment plan for finishing operations. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

(1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;

(2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in §63.805 (d) or (e).

(3) Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

(4) If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(i) The exceedance is no more than 15.0 percent above the baseline level;

(ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in §63.805 (d) or (e));

(iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

(5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If, after November 1998, an affected source uses a VHAP of potential concern listed in table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.

§ 63.804 Compliance procedures and monitoring requirements.

(d) The owner or operator of a new affected source subject to §63.802(b)(1) may comply with those provisions by using any of the following methods:

(1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;

(2) Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

(4) Use any combination of an averaging approach, as described in (d)(1), compliant finishing materials, as described in (d)(2), and a control system, as described in (d)(3).

(e) The owner or operator of a new affected source subject to §63.802(b)(2) shall comply with the provisions using either of the following methods:

(1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied; or

(f) Initial compliance. (1) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that comply through the procedures established in §63.804 (a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by §63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.

(2) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that comply through the procedures established in §63.804 (a)(2) or (d)(2) shall submit an initial compliance status report, as required by §63.807(b), stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.

(3) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that are complying through the procedures established in §63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:

(i) Submitting an initial compliance status report, as required by §63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or

(ii) Submitting an initial compliance status report, as required by §63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

(5) Owners or operators of an affected source subject to the provisions of §63.802 (a)(2) or (b)(2) that comply through the procedures established in §63.804 (b), (c)(1), or (e)(1), shall submit an initial compliance status report, as required by §63.807(b), stating that compliant contact adhesives are being used by the affected source.

(7) Owners or operators of an affected source subject to the provisions of §63.802 (a)(3) or (b)(3) shall submit an initial compliance status report, as required by §63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in §63.803 shall submit an initial compliance status report, as required by §63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

(g) Continuous compliance demonstrations. (1) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that comply through the procedures established in §63.804 (a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(2) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that comply through the procedures established in §63.804 (a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(3) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that are complying through the procedures established in §63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in paragraph (g)(3) (i) or (ii) of this section.

(i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required by §63.807(c).

(A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(ii) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semiannual report required by §63.807(c).

(A) The compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(C) An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in §63.804 (a)(2) or (d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.

(5) Owners or operators of an affected source subject to the provisions of §63.802 (a)(2) (i) or (ii) or (b)(2) that comply through the procedures established in §63.804 (b), (c)(1), or (e)(1), shall submit a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(7) Owners or operators of an affected source subject to the provisions of §63.802 (a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in §63.803 shall submit a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

§ 63.805 Performance test methods.

(a) The EPA Method 311 of appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

§ 63.806 Recordkeeping requirements.

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of §63.10 of subpart A, according to the applicability criteria in §63.800(d) of this subpart.
- (b) The owner or operator of an affected source subject to the emission limits in §63.802 of this subpart shall maintain records of the following:
- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in §63.802; and
 - (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in §63.802; and
 - (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in §63.802 (a)(3) or (b)(3).
- (c) The owner or operator of an affected source following the compliance method in §63.804 (a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
- (d) The owner or operator of an affected source following the compliance procedures of §63.804 (f)(3)(ii) and (g)(3)(ii) shall maintain the records required by §63.806(b) as well as records of the following:
- (1) Solvent and coating additions to the continuous coater reservoir;
 - (2) Viscosity measurements; and
 - (3) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
- (e) The owner or operator of an affected source subject to the work practice standards in §63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
- (1) Records demonstrating that the operator training program required by §63.803(b) is in place;

- (2) Records collected in accordance with the inspection and maintenance plan required by §63.803(c);
- (3) Records associated with the cleaning solvent accounting system required by §63.803(d);
- (4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by §63.803(h)(5).
- (5) Records associated with the formulation assessment plan required by §63.803(l); and
- (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (h) The owner or operator of an affected source subject to the emission limits in §63.802 and following the compliance provisions of §63.804(f) (1), (2), (3), (5), (7) and (8) and §63.804(g) (1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with §63.807(c) for each semiannual period following the compliance date.
- (i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by §63.9(h) and §63.807(b) and the semiannual reports required by §63.807(c).
- (j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of §63.10(b)(1).

§ 63.807 Reporting requirements.

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of §63.7 through §63.10 of subpart A (General Provisions) according to the applicability criteria in §63.800(d) of this subpart.
- (b) The owner or operator of an affected source demonstrating compliance in accordance with §63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by §63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by §63.804(f) (1), (2), (3), (5), (7), and (8) of this subpart.
- (c) The owner or operator of an affected source demonstrating compliance in accordance with §63.804(g) (1), (2), (3), (5), (7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
 - (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
 - (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
 - (3) The semiannual reports shall include the information required by §63.804(g) (1), (2), (3), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
 - (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

(e) The owner or operator of an affected source required to provide a written notification under §63.803(l)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

§ 63.808 Implementation and enforcement.

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of alternatives to the requirements in §§63.800, 63.802, and 63.803(a)(1), (b), (c) introductory text, and (d) through (l).

(2) Approval of alternatives to the monitoring and compliance requirements in §§63.804(f)(4)(iv)(D) and (E), 63.804(g)(4)(iii)(C), 63.804(g)(4)(vi), and 63.804(g)(6)(vi).

(3) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart, as well as approval of any alternatives to the specific test methods under §§63.805(a), 63.805(d)(2)(v), and 63.805(e)(1).

(4) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.

(5) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

§§ 63.809-63.819 [Reserved]

Table 1 to Subpart JJ of Part 63 - General Provisions Applicability to Subpart JJ		
Reference	Applies to Subpart JJ	Comment
63.1(a)	Yes	
63.1(b)(1)	No	Subpart JJ specifies applicability.
63.1(b)(2)	Yes	
63.1(b)(3)	Yes	
63.1(c)(1)	No	Subpart JJ specifies applicability.
63.1(c)(2)	No	Area sources are not subject to subpart JJ.
63.1(c)(4)	Yes	
63.1(c)(5)	Yes	
63.1(e)	Yes	
63.2	Yes	Additional terms are defined in 63.801(a) of subpart JJ. When overlap between subparts A and JJ occurs, subpart JJ takes precedence.
63.3	Yes	Other units used in subpart JJ are defined in 63.801(b).
63.4	Yes	
63.5	Yes	

Table 1 to Subpart JJ of Part 63 - General Provisions Applicability to Subpart JJ		
Reference	Applies to Subpart JJ	Comment
63.6(a)	Yes	
63.6(b)(1)	Yes	
63.6(b)(2)	Yes	
63.6(b)(3)	Yes	
63.6(b)(4)	No	May apply when standards are proposed under Section 112(f) of the CAA.
63.6(b)(5)	Yes	
63.6(b)(7)	Yes	
63.6(c)(1)	Yes	
63.6(c)(2)	No	
63.6(c)(5)	Yes	
63.6(e)(1)	Yes	
63.6(e)(2)	Yes	
63.6(e)(3)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.6(f)(1)	No	Affected sources complying through the procedures specified in 63.804 (a)(1), (a)(2), (b), (c)(1), (d)(1), (d)(2), (e)(1), and (e)(2) are subject to the emission standards at all times, including periods of startup, shutdown, and malfunction.
63.6(f)(2)	Yes	
63.6(f)(3)	Yes	
63.6(g)	Yes	
63.6(h)	No	
63.6 (i)(1)-(i)(3)	Yes	
63.6(i)(4)(i)	Yes	
63.6(i)(4)(ii)	No	
63.6 (i)(5)-(i)(14)	Yes	
63.6(i)(16)	Yes	
63.6(j)	Yes	
63.7	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(a)	Yes	
63.9(b)	Yes	Existing sources are required to submit initial notification report within 270 days of the effective date.
63.9(c)	Yes	
63.9(d)	Yes	
63.9(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(f)	No	
63.9(g)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(h)	Yes	63.9(h)(2)(ii) applies only to affected sources using a control device to comply with the rule.
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	
63.10(b)(1)	Yes	
63.10(b)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(b)(3)	Yes	
63.10(c)	Yes	
63.10(d)(1)	Yes	
63.10(d)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.

Reference	Applies to Subpart JJ	Comment
63.10(d)(3)	No	
63.10(d)(4)	Yes	
63.10(d)(5)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(f)	Yes	
63.11	No	
63.12-63.15	Yes	

Chemical Name	CAS Number	Chemical Name	CAS Number
Acetaldehyde	75070	Ethylidene dichloride (1,1-Dichloroethane)	75343
Acetamide	60355	Formaldehyde	50000
Acetonitrile	75058	Glycol ethers ^(a)	-----
Acetophenone	98862	Hexachlorobenzene	118741
2-Acetylaminofluorine	53963	Hexachloro-1,3-butadiene	87683
Acrolein	107028	Hexachloroethane	67721
Acrylamide	79061	Hexamethylene-1,6-diisocyanate	822060
Acrylic acid	79107	Hexamethylphosphoramide	680319
Acrylonitrile	107131	Hexane	110543
Allyl chloride	107051	Hydrazine	302012
4-Aminobiphenyl	92671	Hydroquinone	123319
Aniline	62533	Isophorone	78591
o-Anisidine	90040	Maleic anhydride	108316
Benzene	71432	Methanol	67561
Benzidine	92875	Methyl bromide (Bromomethane)	74839
Benzotrichloride	98077	Methyl chloride (Chloromethane)	74873
Benzyl chloride	100447	Methyl chloroform (1,1,1-Trichloroethane)	71556
Biphenyl	92524	Methyl ethyl ketone (2-Butanone)	78933
Bis(2-ethylhexyl) phthalate (DEHP)	117817	Methylhydrazine	60344
Bis(chloromethyl) ether	542881	Methyl iodide (Iodomethane)	74884
Bromoform	75252	Methyl isobutyl ketone (Hexone)	108101
1,3-Butadiene	106990	Methyl isocyanate	624839
Caprolactam	105602	Methyl methacrylate	80626
Carbon disulfide	75150	Methyl tert-butyl ether	1634044
Carbon tetrachloride	56235	4,4'-Methylenebis (2-chloroaniline)	101144
Carbonyl sulfide	463581	Methylene chloride (Dichloromethane)	75092
Catechol	120809	4,4'-Methylenediphenyl diisocyanate (MDI)	101688
Chloroacetic acid	79118	4,4'-Methylenedianiline	101779
2-Chloroacetophenone	532274	Naphthalene	91203
Chlorobenzene	108907	Nitrobenzene	98953
Chloroform	67663	4-Nitrobiphenyl	92933
Chloromethyl methyl ether	107302	4-Nitrophenol	100027
Chloroprene	126998	2-Nitropropane	79469
Cresols (isomers and mixture)	1319773	N-Nitroso-N-methylurea	684935
o-Cresol	95487	N-Nitrosodimethylamine	62759
m-Cresol	108394	N-Nitrosomorpholine	59892
p-Cresol	106445	Phenol	108952
Cumene	98828	p-Phenylenediamine	106503
2,4-D (2,4-Dichlorophenoxyacetic acid,	94757	Phosgene	75445

Table 2 to Subpart JJ of Part 63 - List of Volatile Hazardous Air Pollutants			
Chemical Name	CAS Number	Chemical Name	CAS Number
including salts and esters)			
DDE (1,1-Dichloro-2,2-bis (pchlorophenyl) ethylene)	72559	Phthalic anhydride	85449
Diazomethane	334883	Polychlorinated biphenyls (Aroclors)	1336363
Dibenzofuran	132649	Polycyclic Organic Matter ^(b)	0
1,2-Dibromo-3-chloropropane	96128	1,3-Propane sultone	1120714
Dibutylphthalate	84742	beta-Propiolactone	57578
1,4-Dichlorobenzene	106467	Propionaldehyde	123386
3,3'-Dichlorobenzidine	91941	Propoxur (Baygon)	114261
Dichloroethyl ether (Bis (2-chloroethyl) ether)	111444	Propylene dichloride (1,2-Dichloropropane)	78875
1,3-Dichloropropene	542756	Propylene oxide	75569
Diethanolamine	111422	1,2-Propylenimine (2-Methyl aziridine)	75558
N,N-Dimethylaniline	121697	Quinone	106514
Diethyl sulfate	64675	Styrene	100425
3,3'-Dimethoxybenzidine	119904	Styrene oxide	96093
4-Dimethylaminoazobenzene	60117	2,3,7,8-Tetrachlorodibenzo-pdioxin	1746016
3,3'-Dimethylbenzidine	119937	1,1,2,2-Tetrachloroethane	79345
Dimethylcarbamoyl chloride	79447	Tetrachloroethylene (Perchloroethylene)	127184
N,N-Dimethylformamide	68122	Toluene	108883
1,1-Dimethylhydrazine	57147	2,4-Toluenediamine	95807
Dimethyl phthalate	131113	Toluene-2,4-diisocyanate	584849
Dimethyl sulfate	77781	o-Toluidine	95534
4,6-Dinitro-o-cresol, and salts	534521	1,2,4-Trichlorobenzene	120821
2,4-Dinitrophenol	51285	1,1,2-Trichloroethane	79005
2,4-Dinitrotoluene	121142	Trichloroethylene	79016
1,4-Dioxane (1,4-Diethyleneoxide)	123911	2,4,5-Trichlorophenol	95954
1,2-Diphenylhydrazine	122667	2,4,6-Trichlorophenol	88062
Epichlorohydrin (1-Chloro-2,3-epoxypropane)	106898	Triethylamine	121448
1,2-Epoxybutane	106887	Trifluralin	1582098
Ethyl acrylate	140885	2,2,4-Trimethylpentane	540841
Ethylbenzene	100414	Vinyl acetate	108054
Ethyl carbamate (Urethane)	51796	Vinyl bromide	593602
Ethyl chloride (Chloroethane)	75003	Vinyl chloride	75014
Ethylene dibromide (Dibromoethane)	106934	Vinylidene chloride (1,1-Dichloroethylene)	75354
Ethylene dichloride (1,2-Dichloroethane)	107062	Xylenes (isomers and mixture)	1330207
Ethylene glycol	107211	o-Xylene	95476
Ethylene oxide	75218	m-Xylene	108383
Ethylenethiourea	96457	p-Xylene	106423
<p>(a) Includes mono- and di-ethers of ethylene glycol, diethylene glycols and triethylene glycol; R-(OCH₂CH₂)_nRR-OR where: n = 1, 2, or 3, R = alkyl or aryl groups R[prime]= R, H, or groups which, when removed, yield glycol ethers with the structure: R-(OCH₂CH₂)_n-OH. Polymers are excluded from the glycol category.</p> <p>(b) Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.</p>			

Emission Point	New Source
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied	0.8 ^(a)
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied	
-stains.....	1.0 ^(a)
-washcoats.....	0.8 ^{(a)(b)}
-sealers.....	0.8 ^(a)
-topcoats.....	0.8 ^(a)
-basecoats.....	0.8 ^{(a)(b)}
-enamels.....	0.8 ^{(a)(b)}
-thinners (maximum % HAP allowable); or	10.0
(d) Use any combination of (a) and (b)	0.8
Cleaning Operations:	
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8
Contact Adhesives:	
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:	
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates.....	NA ^(d)
ii. For foam adhesives used in products that meet flammability requirements.....	0.2
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements).....	0.2
<p>(a) The limits refer to the VHAP content of the coating, as applied.</p> <p>(b) Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent HAP by weight.</p> <p>(d) There is no limit on the VHAP content of these adhesives</p>	

Chemical name	CAS Number	Chemical name	CAS Number
4-Aminobiphenyl	92671	Acrylonitrile	107131
Styrene oxide	96093	Ethylene dibromide (1,2-Dibromoethane)	106934
Diethyl sulfate	64675	DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	72559
N-Nitrosomorpholine	59892	Chlorobenzilate	510156
Dimethyl formamide	68122	Dichlorvos	62737
Hexamethylphosphoramide	680319	Vinyl chloride	75014
Acetamide	60355	Coke Oven Emissions	
4,4[prime]-Methylenedianiline	101779	Ethylene oxide	75218
o-Anisidine	90040	Ethylene thiourea	96457
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746016	Vinyl bromide (bromoethene)	593602
Beryllium salts		Selenium sulfide (mono and di)	7488564
Benzidine	92875	Chloroform	67663
N-Nitroso-N-methylurea	684935	Pentachlorophenol	87865
Bis (chloromethyl) ether	542881	Ethyl carbamate (Urethane)	51796

Table 4 to Subpart JJ of Part 63 - Pollutants Excluded From Use in Cleaning and Washoff Solvents			
Chemical name	CAS Number	Chemical name	CAS Number
Dimethyl carbamoyl chloride	79447	Ethylene dichloride (1,2-Dichloroethane)	107062
Chromium compounds (hexavalent)		Propylene dichloride (1,2-Dichloropropane)	78875
1,2-Propylenimine (2-Methyl aziridine)	75558	Carbon tetrachloride	56235
Arsenic and inorganic arsenic compounds	99999904	Benzene	71432
Hydrazine	302012	Methyl hydrazine	60344
1,1-Dimethyl hydrazine	57147	Ethyl acrylate	140885
Beryllium compounds	7440417	Propylene oxide	75569
1,2-Dibromo-3-chloropropane	96128	Aniline	62533
N-Nitrosodimethylamine	62759	1,4-Dichlorobenzene(p)	106467
Cadmium compounds		2,4,6-Trichlorophenol	88062
Benzo (a) pyrene	50328	Bis (2-ethylhexyl) phthalate (DEHP)	117817
Polychlorinated biphenyls (Aroclors)	1336363	o-Toluidine	95534
Heptachlor	76448	Propoxur	114261
3,3[prime]-Dimethyl benzidine	119937	1,4-Dioxane (1,4-Diethyleneoxide)	123911
Nickel subsulfide	12035722	Acetaldehyde	75070
Acrylamide	79061	Bromoform	75252
Hexachlorobenzene	118741	Captan	133062
Chlordane	57749	Epichlorohydrin	106898
1,3-Propane sultone	1120714	Methylene chloride (Dichloromethane)	75092
1,3-Butadiene	106990	Dibenz (ah) anthracene	53703
Nickel refinery dust		Chrysene	218019
2-Acetylaminoflourine	53963	Dimethyl aminoazobenzene	60117
3,3[prime]-Dichlorobenzidine	53963	Benzo (a) anthracene	56553
Lindane (hexachlorocyclohexane, gamma)	58899	Benzo (b) fluoranthene	205992
2,4-Toluene diamine	95807	Antimony trioxide	1309644
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444	2-Nitropropane	79469
1,2-Diphenylhydrazine	122667	1,3-Dichloropropene	542756
Toxaphene (chlorinated camphene)	8001352	7, 12-Dimethylbenz(a) anthracene	57976
2,4-Dinitrotoluene	121142	Benz(c) acridine	225514
3,3[prime]-Dimethoxybenzidine	119904	Indeno(1,2,3-cd)pyrene	193395
Formaldehyde	50000	1,2:7,8-Dibenzopyrene	189559
4,4[prime]-Methylene bis (2-chloroaniline)	101144		

Table 5 to Subpart JJ of Part 63—List of VHAP of Potential Concern Identified by Industry		
CAS Number	Chemical name	EPA de minimis (tons/yr)
68122	Dimethyl formamide	1.0
50000	Formaldehyde	0.2
75092	Methylene chloride	4.0
79469	2-Nitropropane	1.0
78591	Isophorone	0.7
1000425	Styrene monomer	1.0
108952	Phenol	0.1
111422	Dimethanolamine	5.0
109864	2-Methoxyethanol	10.0
111159	2-Ethoxyethyl acetate	10.0

Table 6 to Subpart JJ of Part 63—VHAP of Potential Concern		
CAS Number	Chemical name	EPA de minimis (tons/yr)*
92671	4-Aminobiphenyl	1.0
96093	Styrene oxide	1.0
64675	Diethyl sulfate	1.0
59892	N-Nitrosomorpholine	1.0
68122	Dimethyl formamide	1.0
680319	Hexamethylphosphoramide	0.01
60355	Acetamide	1.0
101779	4,4[prime]-Methylenedianiline	1.0
90040	o-Anisidine	1.0
1746016	2,3,7,8-Tetrachlorodibenzo-p- dioxin	0.00000006
92875	Benzidine	0.00003
684935	N-Nitroso-N-methylurea	0.00002
542881	Bis(chloromethyl) ether	0.00003
79447	Dimethyl carbamoyl chloride	0.002
75558	1,2-Propylenimine (2-Methyl aziridine)	0.0003
57147	1,1-Dimethyl hydrazine	0.0008
96128	1,2-Dibromo-3-chloropropane	0.001
62759	N-Nitrosodimethylamine	0.0001
50328	Benzo (a) pyrene	0.001
1336363	Polychlorinated biphenyls (Aroclors)	0.0009
76448	Heptachlor	0.002
119937	3,3[prime]-Dimethyl benzidine	0.001
79061	Acrylamide	0.002
118741	Hexachlorobenzene	0.004
57749	Chlordane	0.005
1120714	1,3-Propane sultone	0.003
106990	1,3-Butadiene	0.007
53963	2-Acetylaminoflourine	0.0005
91941	3,3[prime]-Dichlorobenzidine	0.02
58899	Lindane (hexachlorocyclohexane, gamma)	0.005
95807	2,4-Toluene diamine	0.002
111444	Dichloroethyl ether (Bis(2- chloroethyl)ether)	0.006
122667	1,2_Diphenylhydrazine	0.009
8001352	Toxaphene (chlorinated camphene)	0.006
121142	2,4-Dinitrotoluene	0.002
119904	3,3[prime]-Dimethoxybenzidine	0.01
50000	Formaldehyde	0.2
101144	4,4[prime]-Methylene bis(2- chloroaniline)	0.02
107131	Acrylonitrile	0.03
106934	Ethylene dibromide(1,2- Dibromoethane)	0.01
72559	DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	0.01
510156	Chlorobenzilate	0.04
62737	Dichlorvos	0.02
75014	Vinyl chloride	0.02
75218	Ethylene oxide	0.09
96457	Ethylene thiourea	0.06
593602	Vinyl bromide (bromoethene)	0.06
67663	Chloroform	0.09
87865	Pentachlorophenol	0.07
51796	Ethyl carbamate (Urethane)	0.08
107062	Ethylene dichloride (1,2- Dichloroethane)	0.08

Table 6 to Subpart JJ of Part 63—VHAP of Potential Concern		
CAS Number	Chemical name	EPA de minimis (tons/yr)*
78875	Propylene dichloride (1,2- Dichloropropane)	0.1
56235	Carbon tetrachloride	0.1
71432	Benzene	0.2
140885	Ethyl acrylate	0.1
75569	Propylene oxide	0.5
62533	Aniline	0.1
106467	1,4-Dichlorobenzene(p)	0.3
88062	2,4,6-Trichlorophenol	0.6
117817	Bis (2-ethylhexyl) phthalate (DEHP)	0.5
95534	o-Toluidine	0.4
114261	Propoxur	2.0
79016	Trichloroethylene	1.0
123911	1,4-Dioxane (1,4-Diethyleneoxide)	0.6
75070	Acetaldehyde	0.9
75252	Bromoform	2.0
133062	Captan	2.0
106898	Epichlorohydrin	2.0
75092	Methylene chloride (Dichloromethane)	4.0
127184	Tetrachloroethylene (Perchloroethylene)	4.0
53703	Dibenz (ah) anthracene	0.01
218019	Chrysene	0.01
60117	Dimethyl aminoazobenzene	1.0
56553	Benzo (a) anthracene	0.01
205992	Benzo (b) fluoranthene	0.01
79469	2-Nitropropane	1.0
542756	1,3-Dichloropropene	1.0
57976	7,12-Dimethylbenz (a) anthracene	0.01
225514	Benz(c)acridine	0.01
193395	Indeno(1,2,3-cd)pyrene	0.01
189559	1,2:7,8-Dibenzopyrene	0.01
79345	1,1,2,2-Tetrachloroethane	0.03
91225	Quinoline	0.0006
75354	Vinylidene chloride (1,1- Dichloroethylene)	0.04
87683	Hexachlorobutadiene	0.09
82688	Pentachloronitrobenzene (Quintobenzene)	0.03
78591	Isophorone	0.7
79005	1,1,2-Trichloroethane	0.1
74873	Methyl chloride (Chloromethane)	1.0
67721	Hexachloroethane	0.5
1582098	Trifluralin	0.9
1319773	Cresols/Cresylic acid (isomers and mixture)	1.0
108394	m-Cresol	1.0
75343	Ethylidene dichloride (1,1- Dichloroethane)	1.0
95487	o-Cresol	1.0
106445	p-Cresol	1.0
74884	Methyl iodide (Iodomethane)	1.0
100425	Styrene	1.0
107051	Allyl chloride	1.0
334883	Diazomethane	1.0
95954	2,4,5_ Trichlorophenol	1.0
133904	Chloramben	1.0

Table 6 to Subpart JJ of Part 63—VHAP of Potential Concern		
CAS Number	Chemical name	EPA de minimis (tons/yr)*
106887	1,2_Epoxybutane	1.0
108054	Vinyl acetate	1.0
126998	Chloroprene	1.0
123319	Hydroquinone	1.0
92933	4-Nitrobiphenyl	1.0
56382	Parathion	0.1
13463393	Nickel Carbonyl	0.1
60344	Methyl hydrazine	0.006
151564	Ethylene imine	0.0003
77781	Dimethyl sulfate	0.1
107302	Chloromethyl methyl ether	0.1
57578	beta-Propiolactone	0.1
100447	Benzyl chloride	0.04
98077	Benzotrichloride	0.0006
107028	Acrolein	0.04
584849	2,4_Toluene diisocyanate	0.1
75741	Tetramethyl lead	0.01
78002	Tetraethyl lead	0.01
12108133	Methylcyclopentadienyl manganese	0.1
624839	Methyl isocyanate	0.1
77474	Hexachlorocyclopentadiene	0.1
62207765	Fluomine	0.1
10210681	Cobalt carbonyl	0.1
79118	Chloroacetic acid	0.1
534521	4,6-Dinitro-o-cresol, and salts	0.1
101688	Methylene diphenyl diisocyanate	0.1
108952	Phenol	0.1
62384	Mercury, (acetato-o) phenyl	0.01
98862	Acetophenone	1.0
108316	Maleic anhydride	1.0
532274	2-Chloroacetophenone	0.06
51285	2,4-Dinitrophenol	1.0
109864	2-Methoxy ethanol	10.0
98953	Nitrobenzene	1.0
74839	Methyl bromide (Bromomethane)	10.0
75150	Carbon disulfide	1.0
121697	N,N-Dimethylaniline	1.0
106514	Quinone	5.0
123386	Propionaldehyde	5.0
120809	Catechol	5.0
85449	Phthalic anhydride	5.0
463581	Carbonyl sulfide	5.0
132649	Dibenzofurans	5.0
100027	4-Nitrophenol	5.0
540841	2,2,4-Trimethylpentane	5.0
111422	Diethanolamine	5.0
822060	Hexamethylene-1,6-diisocyanate	5.0
	Glycol ethers (a)	5.0
	Polycyclic organic matter (b)	0.01

*These values are based on the de minimis levels provided in the proposed rulemaking pursuant to section 112(g) of the Act using a 70- year lifetime exposure duration for all VHAP. Default assumptions and the de minimis values based on inhalation reference doses (RfC) are

Table 6 to Subpart JJ of Part 63—VHAP of Potential Concern		
CAS Number	Chemical name	EPA de minimis (tons/yr)*
not changed by this adjustment.		
(a) Except for ethylene glycol butyl ether, ethylene glycol ethyl ether (2-ethoxy ethanol), ethylene glycol hexyl ether, ethylene glycol methyl ether (2-methoxyethanol), ethylene glycol phenyl ether, ethylene glycol propyl ether, ethylene glycol mono-2-ethylhexyl ether, diethylene glycol butyl ether, diethylene glycol ethyl ether, diethylene glycol methyl ether, diethylene glycol hexyl ether, diethylene glycol phenyl ether, diethylene glycol propyl ether, triethylene glycol butyl ether, triethylene glycol ethyl ether, triethylene glycol methyl ether, triethylene glycol propyl ether, ethylene glycol butyl ether acetate, ethylene glycol ethyl ether acetate, and diethylene glycol ethyl ether acetate.		
(b) Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah) anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.		

D.1.11 One-Time Deadlines Relating to Wood Furniture Manufacturing Requirements Notifications [40 CFR Part 63, Subpart JJ]

The Permittee shall comply with the following notification requirements by the dates listed:

Requirement	Rule Cite	Affected Facilities	Deadline
Initial Notification*	40 CFR 63.807(a) and 40 CFR 63.9(b)	automated cabinet finishing line and Spray Booth 2	upon startup
General Notification: source is subject to special compliance requirements	40 CFR 63.807(a) and 40 CFR 63.9(d)	automated cabinet finishing line and Spray Booth 2	upon startup
Notification of Compliance Status (if demonstrating compliance in accordance with §63.804(f) (1), (2), (3), (5), (7) and (8))	40 CFR 63.807(b); 40 CFR 63.9(h)	automated cabinet finishing line and Spray Booth 2	within 60 days after compliance demonstration,
Semiannual Compliance Status Reports (if demonstrating compliance in accordance with §63.804(g) (1), (2), (3), (5), (7), and (8))	40 CFR 63.807(c); 40 CFR 63.9(h)	automated cabinet finishing line and Spray Booth 2	First report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

*The application for this Part 70 Significant Source Modification satisfies the requirement to submit an Initial Notification under 40 CFR 63.9(b).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking Operation

- (c) one (1) woodworking operation, approved for construction in 2000, consisting of various woodworking equipment, with particulate matter emissions controlled by one (1) baghouse and one (1) cyclone.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed 1.93 pounds per hour when operating at a process weight rate of 0.325 tons per hour.

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

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

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

Compliance with this allowable rate of emission, combined with the potential PM emissions from all other emission units at this source, will also limit the source-wide total potential to emit PM to less than 250 tons per 12 consecutive month period. Therefore, compliance with this allowable rate of emission renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 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 this facility and any control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with condition D.2.1, the baghouse for particulate control shall be in operation and control emissions at all times the woodworking operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Visible Emissions Notations

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

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

D.2.5 Baghouse Inspections

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

D.2.6 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 Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking operation stack exhaust when venting to the atmosphere.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Kountry Wood Products, LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Mailing Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Permit No.: T039-23644-00518

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: Kountry Wood Products, LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Mailing Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Permit No.: T039-23644-00518

This form consists of 2 pages

Page 1 of 2

- 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 DATA SECTION**

PART 70 Operating Permit Quarterly Report

Source Name: Kountry Wood Products, LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Mailing Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Permit No.: T039-23644-00518
Facility: Surface Coating Spray Booth 2
Parameter: Volatile Organic Compound (VOC) Emissions
Limit: 99.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

PART 70 Operating Permit Quarterly Report

Source Name: Kountry Wood Products, LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Mailing Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Permit No.: T039-23644-00518
Facility: Automated Cabinet Finishing Line
Parameter: Volatile Organic Compound (VOC) Emissions
Limit: 99.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

- 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: Kountry Wood Products, LLC
 Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
 Mailing Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
 Part 70 Permit No.: T039-23644-00518

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

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

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Kountry Wood Products, LLC
500 E Wabash Avenue
Nappanee, Indiana 46550

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Kountry Wood Products, LLC, located at 500 E Wabash Avenue, Nappanee, Indiana 46550, completed construction of the automated cabinet finishing line on _____ in conformity with the requirements and intent of the permit application received by the Office of Air Quality on September 14, 2006 and as permitted pursuant to the Part 70 Permit No. 039-23644-00518 issued on _____.
5. Additional _____ were constructed/substituted as described in the attachment to this document
(operations/facilities)
and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

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

Technical Support Document (TSD) for a FESOP Transitioning to a Part 70 Permit
with New Source Review (NSR)

Source Description and Location

Source Name: Kountry Wood Products, LLC
 Source Location: 500 E Wabash Avenue, Nappanee, Indiana 46550
 County: Elkhart
 SIC Code: 2434 (Manufacturing of Wood Kitchen Cabinets)
 NSR and Part 70 Operating Permit No.: T039-23644-00518
 Permit Writer: Nathan C. Bell

History

Kountry Wood Products, LLC was issued a renewed Federally Enforceable State Operating Permit (FESOP) No. 039-20347-00518 on September 22, 2006 for a stationary wood processing and finishing plant (kitchen cabinet manufacturing). The potential to emit volatile organic compounds (VOCs) of the existing cabinet coating operations is limited to less than 100 tons per year.

Existing Approvals

The source is operating under FESOP No. 039-20347-00518 issued on September 22, 2006.

Due to this application, the source is transitioning from a FESOP to a Part 70 Permit.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment or Unclassifiable
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment or Unclassifiable
8-Hour Ozone	Basic Nonattainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standard. Elkhart County has been designated as basic nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Elkhart County has been classified as attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

- (c) Elkhart County has been classified as attainment or unclassifiable for all the other regulated criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) 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.
- (e) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

The table below summarizes the potential to emit (PTE) of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in FESOP No. 039-20347-00518:

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10 ⁽¹⁾	SO ₂	NOx	VOC	CO	Total HAPs	Single HAP
Spray Booth 1 ⁽²⁾	0.25	0.25	0	0	99.8 ⁽³⁾	0	2.75	<9.9 ⁽⁴⁾
Spray Booth 2 ⁽²⁾	0.51	0.51	0	0		0	8.77	
Woodworking Operation	4.96	4.96	0	0	0	0	0	0
Insignificant Activities ⁽⁵⁾	0.04	0.17	0.01	2.28	0.13	1.92	0.04	0.04
Total Limited/Controlled PTE	5.76	5.89	0.01	2.28	<100⁽³⁾	1.92	11.56	<10⁽⁴⁾

(1) US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions
 (2) As part of this modification, Spray Booth 1 is being removed from the source and the corresponding VOC limit will be allocated to Spray Booth 2 only.
 (3) Pursuant to F039-20347-00518, the total combined VOC input to the two (2) surface coating spray booths, identified as Booth 1 and Booth 2, shall not exceed 99.8 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
 (4) Pursuant to F039-20347-00518, the single HAP input to the two (2) surface coating spray booths, identified as Booth 1 and Booth 2, shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
 (5) Uncontrolled potential to emit. Insignificant activities consist of 2 air make up units and 10 natural gas fired heaters.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act.
- (d) These emissions are based upon FESOP No. 039-20347-00518 issued on September 22, 2006.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ PM/PM10 emission data and the 2003 OAQ VOC and worst single HAP emission data.

Pollutant	Emissions (tons/yr)
PM	0.13
PM10	0.12
SO ₂	NR
NO _x	NR
VOC	64.7
CO	NR
Worst Single HAP	2.03
Total HAPs	NR

NR = Not Reported

Background and Description of New Source Construction and Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Kountry Wood Products, LLC on September 14, 2006, relating to the construction and operation of a new automated cabinet finishing line, a change in the operation of existing Spray Booth 2 to be a backup spray booth coating a maximum of 50 wood cabinet door fronts per hour, and removal of Spray Booth 1 from the source.

The following is a list of the new emission units and pollution control devices proposed at this source during this review process:

- (a) one (1) automated cabinet finishing line, approved for construction in 2006, including the following equipment:
 - (1) one (1) stain line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) infra red pre-heater exhausting through stack SL1;
 - (B) one (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
 - (C) one (1) stain wipe machine, exhausting through Stack SL3; and
 - (D) two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.
 - (2) one (1) sealer line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) infra red pre-heater exhausting through stack SLE1;
 - (B) one (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (C) one (1) sealer flash oven, exhausting through Stack SLE3; and
 - (D) one (1) electric oven to aid in the drying process, exhausting through Stack SLE4.

- (3) one (1) topcoat line, approved for construction in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) one (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
 - (B) one (1) infra red pre-heater exhausting through stack TL1;
 - (C) one (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (D) one (1) topcoat flash oven, exhausting through Stack TL3; and
 - (E) one (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered a new affected source.

The following is a list of the insignificant activities, as defined in 326 IAC 2-7-1(21), proposed at this source during this review process:

- (a) natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr:
 - (1) three (3) natural gas-fired radiant tube heaters, approved for construction in 2006, identified as ISA-1 through ISA-3, each rated at 0.125 MMBtu/hr; and
 - (2) two (2) natural gas-fired radiant tube heaters, approved for construction in 2006, identified as ISA-4 through ISA-5, each rated at 0.150 MMBtu/hr;

Other Permitted Emission Units and Insignificant Activities
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The following is a list of the other permitted emission units and pollution control devices at this source:

- (a) one (1) surface coating spray booth, identified as Spray Booth 2, approved for construction in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered an existing affected source.

- (b) one (1) woodworking operation, approved for construction in 2000, consisting of various woodworking equipment, with particulate matter emissions controlled by one (1) baghouse and one (1) cyclone.

The following is a list of the other permitted insignificant activities, as defined in 326 IAC 2-7-1(21), at this source:

- (a) natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr:
 - (1) one (1) natural gas-fired air make-up unit, approved for construction in 2000, having a heat input rate of 3.0 MMBtu/hr;
 - (2) one (1) natural gas-fired air make-up unit, approved for construction in 2000, having a heat input rate of 1.0 MMBtu/hr;

- (3) nine (9) natural gas-fired process heaters, approved for construction in 2000, each with heat input rate of 0.108 MMBtu/hr, respectively; and
- (4) one (1) natural gas-fired process heater, approved for construction in 2000, having a heat input rate of 0.24 MMBtu/hr.

Unpermitted Emission Units and Pollution Control Equipment

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

Enforcement Issues

There are no pending enforcement actions pending.

Stack Summary

Table 4 - Stack Summary					
Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
SL1	Stain Line Infra Red Pre-Heater	25	0.74	600	ambient
SL2	Stain Line Finishing Booth	25	1.48	5000	ambient
SL3	Stain Line Wipe Machine	25	0.75	700	ambient
SL4	Stain Line Flash Tunnel	25	1.31	2700	ambient
SL5	Stain Line Flash Tunnel	25	1.31	1350	ambient
SLE1	Sealer Line Infra Red Pre-Heater	25	0.74	600	ambient
SLE2	Sealer Line Finishing Booth	25	1.48	5000	ambient
SLE3	Sealer Line Flash Oven	25	1.31	2700	ambient
SLE4	Sealer Line Electric Oven	25	1.31	2700	ambient
TL1	Topcoat Line Infra Red Pre-Heater	25	0.74	600	ambient
TL2	Topcoat Line Finishing Booth	25	1.48	5000	ambient
TL3	Topcoat Line Flash Oven	25	1.31	2700	ambient
TL4	Topcoat Line Electric Oven	25	1.31	2700	ambient
S1	Spray Booth 2 (Existing)	18	2.50	12,500	ambient
S2	Spray Booth 2 (Existing)	18	2.50	12,500	ambient
S3	Spray Booth 2 (Existing)	18	2.50	12,500	ambient

Emission Calculations

For detailed emission calculations, see Appendix A pages 1 through 8.

Permit Level Determination – Part 70

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

The following table reflects the PTE of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Table 5 - PTE Before Controls of the Proposed Modification	
Pollutant	Potential To Emit (tons/year)
PM	527.01
PM10 ⁽¹⁾	527.16
SO ₂	0.01
NO _x	2.58
VOC	1419
CO	2.17

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

Table 6 - HAPs Before Controls of the Proposed Modification	
HAPs	Potential To Emit (tons/year)
Methanol	174.2
Xylenes	174.2
Methyl isobutyl ketone	52.3
Ethylbenzene	52.3
Chromium	negligible
Manganese	negligible
Nickel	negligible
n-Hexane	0.04
Toluene	174.2
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	8.71
Lead	negligible
Cadmium	negligible
TOTAL HAPs	598.4

This source is transitioning from a FESOP to a Part 70 Permit. After issuance of the Part 70 Permit, this source will be classified as a major source for VOC, total HAPs, and single HAP under Title V, since the potential to emit VOC, total HAPs, and single HAP of the entire source will be greater than the Title V major threshold levels.

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 the Part 70 Permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Table 7 - Potential to Emit of Entire Source After Issuance								
Process/Emission Unit	Potential to Emit After Issuance (tons/year)							
	PM	PM10 ⁽¹⁾	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Existing Source (Before Modification)								
Total PTE (Before Modification) (see Table 2 of this TSD)	5.76	5.89	0.01	2.28	<100	1.92	11.52	<10
Newly Constructed Emission Units (Modification)								
Automated Cabinet Finishing Line	4.13 ⁽²⁾	4.13 ⁽²⁾	0	0	<99.9 ⁽³⁾	0	598.4 ⁽⁴⁾	163.9 ⁽⁴⁾
Radiant Heaters (ISA 1-3, ISA 4-5) ⁽⁵⁾	0.01	0.02	negl.	0.30	0.02	0.25	0.01	0.01
Total PTE of Modification	4.14	4.15	negl.	0.30	<100 ⁽³⁾	0.25	598.4	163.9
Other Permitted Emission Units (After Modification)								
Surface Coating Spray Booth 2	0.25 ⁽²⁾	0.25 ⁽²⁾	0	0	99.8 ⁽⁶⁾	0	37.4	10.2
Woodworking Operation	4.96 ⁽²⁾	4.96 ⁽²⁾	0	0	0	0	0	0
Air Make-Up Units and Process Heaters ⁽⁵⁾	0.04	0.17	0.01	2.28	0.13	1.92	0.04	0.04
Entire Source (After Modification)								
Total PTE of Entire Source (After Modification)	9.93	9.53	0.01	2.58	<200	2.17	635.8	174.2
Threshold Levels								
Title V Major Threshold Level	NA	100	100	100	100	100	25	10
PSD Major Threshold Level	250	250	250	NA	NA	250	NA	NA
Emission Offset Major Threshold Level	NA	NA	NA	100	100	NA	NA	NA
negl. = negligible (1) US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions (2) PTE of PM/PM10 after controls. The Permittee shall use dry filters to control particulate overspray. (3) The source requested the potential to emit VOC from the automated cabinet finishing line be limited to less than 99.9 tons/year, in order to limit the source-wide potential to emit VOC from this modification to less than 100 tons/year. (4) Since all HAPs emitted from the automated cabinet finishing line are VOCs, limiting emission of VOCs will also reduce emission of HAPs. (5) Uncontrolled PTE. (6) The potential to emit VOC from Spray Booth 2, including coating materials and solvents, shall not exceed 99.8 tons per twelve (12) consecutive month period. This was specified under FESOP No. 039-20347-00518.								

- (a) This modification to the existing minor PSD stationary source is not major because the emission increase of this modification is less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

- (b) This modification to the existing minor Emission Offset stationary source is not major, since:
- (1) the NO_x emission increase of this modification is less than the Emission Offset major source threshold levels; and
 - (2) the VOC emission increase of this modification is limited to less than the Emission Offset major source threshold levels. The source shall comply with the following emission limitation:

The total potential to emit VOC from the automated cabinet finishing line shall not exceed 99.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply to the proposed modification.

- (c) After issuance of this Part 70 Permit, this source will be classified as a major source for VOC under Emission Offset since the potential to emit VOC of the entire source is greater than the Emission Offset major source threshold level. After issuance of this Part 70 Permit, the uncontrolled potential to emit NO_x of the entire source is less than 100 tons per year.

Federal Rule Applicability Determination

The following federal rules are applicable to the source:

- (a) New Source Performance Standards (NSPS) 40 CFR Part 60
There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The automated cabinet finishing line and Spray Booth 2 are each subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (40 CFR 63.800 - 63.808), which is incorporated by reference as 326 IAC 20-14-1, because this facility engages in the manufacture of wood furniture or wood furniture components and is located at a plant site that is a major source of HAPs as defined in 40 CFR 63.2.

Prior to this modification, the source was an existing area source as defined by 40 CFR 63.800, since the source was not a major source of HAPs, the actual emissions for the entire source had not exceeded 5 tons of any one HAP per rolling 12-month period and 12.5 tons of any combination of HAP per rolling 12-month period, and at least 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture components (40 CFR 63.800(b)(3)). The automated cabinet finishing line is considered a new affected source and must comply with the provisions of 40 CFR 63, Subpart JJ, immediately upon startup of the line. The existing Spray Booth 2 is considered an existing affected source and must comply with the provisions of 40 CFR 63, Subpart JJ, one year after startup of the automated cabinet finishing line (i.e., one year after the entire source becomes a major source).

Nonapplicable portions of the NESHAP will not be included in the permit.

The automated cabinet finishing line is subject to the following portions of Subpart JJ.

- (1) 40 CFR 63.800(a), (b), (c), (d), and (f)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(b)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804(d)(1), (2), and (4), (e)(1), (f)(1), (2), (3), (5), (7), and (8), and (g)(1), (2), (3), (5), (7), and (8)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806(a), (b), (c), (d), (e), (h), (i), and (j)
- (8) 40 CFR 63.807(a), (b), (c) and (e)
- (9) 40 CFR 63.808

The existing Spray Booth 2 is subject to the following portions of Subpart JJ.

- (1) 40 CFR 63.800(a), (b), (c), (d), and (e)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804(a)(1), (2), and (4), (b), (c)(1), (f)(1), (2), (3), (5), (7), and (8), and (g)(1), (2), (3), (5), (7), and (8)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806(a), (b), (c), (d), (e), (h), (i), and (j)
- (8) 40 CFR 63.807(a), (b), (c) and (e)
- (9) 40 CFR 63.808

The provisions of 40 CFR 63 Subpart A - General Provisions which are incorporated as 326 IAC 20-1-1, apply to the automated cabinet finishing line and Spray Booth 2 except when otherwise specified in 40 CFR 63, Subpart JJ.

- (c) Pursuant to 40 CFR 63.7506(c), the natural gas-fired radiant tube heaters (ISA-1 through ISA-5), air makeup units, and process heaters are not subject to the requirements of 40 CFR 63, Subpart DDDDD, NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (63.7480 through 63.7575) or 40 CFR 63, Subpart A, General Provisions, since they each are considered small gaseous fuel subcategory units, as defined by 40 CFR 63.7575, each with a rated capacity of less than or equal to 10 million British thermal units per hour heat input.
- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:
 - (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following tables are used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each emission unit at this source:

Table 8 - CAM Applicability - PM10							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Automated Cabinet Finishing Line	Dry Filters	Y ⁽¹⁾	>100 (PM10)	<100 (PM10)	100 (PM10)	Y	N
Surface Coating Spray Booth 2	Dry Filters	Y ⁽¹⁾	<100 (PM10)	<100 (PM10)	100 (PM10)	N	N
Woodworking Operation	Baghouse with Cyclone	Y ⁽¹⁾	>100 (PM10)	<100 (PM10)	100 (PM10)	Y	N
Air Make-Up Units and Process Heaters	none	N	<100 (PM10)	NA	100 (PM10)	N	N

(1) Operation of each control device is necessary in order to comply with 326 IAC 6-3-2.

Table 9 - CAM Applicability - VOC							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Automated Cabinet Finishing Line	none	Y	>100 (VOC)	<100 (VOC)	100 (VOC)	N	N
Surface Coating Spray Booth 2	none	Y	>100 (VOC)	<100 (VOC)	100 (VOC)	N	N
Air Make-Up Units and Process Heaters	none	N	<100 (VOC)	NA	100 (VOC)	N	N

The compliance monitoring requirements for the automated cabinet finishing line (controlled by dry filters), Spray Booth 2 (controlled by dry filters), and the woodworking operation (controlled by baghouse with cyclone) will satisfy CAM.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) Pursuant to 326 IAC 2-1.1-4 (Federal Provisions), in case of a conflict between the state rules and a provision of federal law or regulation, the more stringent requirement applies.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
 This minor PSD stationary source was constructed in 1999 after the applicability date of August 7, 1977, and it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1). This modification to the existing minor PSD stationary source will not change the PSD minor status, because the emissions from the entire source will continue to be less than, or limited to less than, the PSD major source threshold levels (see Permit Level Determination - PSD and Emission Offset section above). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

As specified under FESOP No. 039-20347-00518 issued on September 22, 2006, the baghouse for particulate control shall be in operation and control emissions at all times the woodworking operation is in operation (based on the requirements of 326 IAC 6-3-2). Compliance with the 326 IAC 6-3-2 allowable PM emission rate, combined with the potential PM emissions from all other emission units at this source, will limit the source-wide total potential to emit PM to less than 250 tons per 12 consecutive month period. Therefore, compliance with the 326 IAC 6-3-2 allowable PM emission rate renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(c) 326 IAC 2-3 (Emission Offset)

The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. This modification will be constructed in Elkhart County, which has been designated as basic nonattainment for the 8-hour ozone standard. This modification to the existing minor Emission Offset stationary source is not major, since:

- (1) the NO_x emission increase of this modification is less than the Emission Offset major source threshold levels (see Permit Level Determination - PSD and Emission Offset section above); and
- (2) the VOC emission increase of this modification is limited to less than the Emission Offset major source threshold levels (see Permit Level Determination - PSD and Emission Offset section above). The source shall comply with the following emission limitations:

The total potential to emit VOC from the automated cabinet finishing line shall not exceed 99.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply to the proposed modification.

The source shall also continue to comply with the following emission limitation:

The potential to emit VOC from Spray Booth 2, including coating materials and solvents, shall not exceed 99.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This was specified under FESOP No. 039-20347-00518 issued on September 22, 2006.

After issuance of this Part 70 Permit, this source will be classified as a major source for VOC under Emission Offset since the potential to emit VOC of the entire source is greater than the Emission Offset major source threshold level. After issuance of this Part 70 Permit, the uncontrolled potential to emit NO_x of the entire source is less than 100 tons per year.

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

The operation of the automated cabinet finishing line and Spray Booth 2 will emit 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, 326 IAC 2-4.1 would apply to the automated cabinet finishing line and Spray Booth 2; however, pursuant to 326 IAC 2-4.1-1(b)(2), because these units are specifically regulated by NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d) of the CAA, they are each exempt from the requirements of 326 2-4.1.

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

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 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).

(f) 326 IAC 5-1 (Opacity Limitations)

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

- (1) 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.
 - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

Automated Cabinet Finishing Line

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the automated cabinet finishing line, shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Since the automated cabinet finishing line uses dry filters to control particulate overspray, it is in compliance with 326 IAC 6-3-2.

- (i) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
This rule applies to surface coating of wood furnishings, including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material. The automated cabinet finishing line is subject to 326 IAC 8-2-12, since it is a facility of the type described in 326 IAC 8-2-12, the source was constructed after July 1, 1990, and will have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

- 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. Since the automated cabinet finishing line uses air assisted airless spray, it is in compliance with 326 IAC 8-2-12.

- (j) 326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)
The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source is not located in Lake, Porter, Clark, or Floyd County.

- (k) There are no other 326 IAC 8 Rules that are applicable to the automated cabinet finishing line.

Spray Booth 2

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from Spray Booth 2, shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Since Spray Booth 2 uses dry filters to control particulate overspray, it is in compliance with 326 IAC 6-3-2.

- (m) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
This rule applies to surface coating of wood furnishings, including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material. Spray Booth 2 is subject to 326 IAC 8-2-12, since it is a facility of the type described in 326 IAC 8-2-12, the source was constructed after July 1, 1990, and could potentially have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

- 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. Since Spray Booth 2 uses an air assisted airless and HVLP spray application system, it is in compliance with 326 IAC 8-2-12.

- (n) 326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)
The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source is not located in Lake, Porter, Clark, or Floyd County.
- (o) There are no other 326 IAC 8 Rules that are applicable to Spray Booth 2.

Woodworking Operations

- (p) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3 are applicable to the woodworking operation. Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the woodworking operation shall not exceed 1.93 pounds per hour based on a process weight rate equal to 0.325 tons of wood per hour (650 pounds of wood per hour).

In order to comply with the allowable rate of emission, the baghouse for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is in operation. The allowable rate of emission was calculated as follows:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

Compliance with this allowable rate of emission, combined with the potential PM emissions from all other emission units at this source, will also limit the source-wide total potential to emit PM to less than 250 tons per 12 consecutive month period. Therefore, compliance with this allowable rate of emission renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Natural Gas Combustion

- (q) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural gas-fired radiant tube heaters (ISA-1 through ISA-5), air makeup units, and process heaters are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.
- (r) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Each of the natural gas-fired radiant tube heaters (ISA-1 through ISA-5), air makeup units, and process heaters are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.
- (s) 326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)
Each of the natural gas-fired radiant tube heaters (ISA-1 through ISA-5), air makeup units, and process heaters are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

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 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. 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.

Compliance Monitoring Requirements

- (a) The compliance monitoring requirements applicable to the automated cabinet finishing line and Spray Booth 2 are as follows:
 - (1) The Permittee shall perform weekly overspray observations, and daily and monthly inspections of the dry filters.

These monitoring conditions are necessary because the dry filters for the automated cabinet finishing line and Spray Booth 2 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

- (b) The compliance monitoring requirements applicable to the woodworking operation are as follows:
- (1) The Permittee shall perform daily visible emission notations of the woodworking operation stack exhaust; and
 - (2) The Permittee shall perform quarterly inspections of the baghouse.

These monitoring conditions are necessary because the baghouse must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and to render 326 IAC 2-2 (PSD) not applicable.

Recordkeeping and Reporting Requirements

- (a) The recordkeeping and reporting requirements applicable to the automated cabinet finishing line and Spray Booth 2 are as follows:
- (1) The Permittee shall maintain records of weekly overspray observations, daily and monthly inspections, and VOC usage and emissions in order demonstrate compliance with the VOC emission limit; and
 - (2) The Permittee shall submit a quarterly summary of the VOC emissions.
- (b) The recordkeeping and reporting requirements applicable to the woodworking operation are as follows:
- (1) The Permittee shall maintain records of daily visible emission notations of the woodworking operation stack exhaust; and
 - (2) The Permittee shall maintain records of the baghouse inspections results.

Conclusion and Recommendation

- (a) The construction of this proposed modification and the operation of the entire source shall be subject to the conditions of the attached proposed New Source Review and Part 70 Permit No. 039-23644-00518.
- (b) Unless otherwise stated, information used in this review was derived from the application and received by the Office of Air Quality (OAQ) on September 14, 2006. Additional information was received on August 1, 2006, August 17, 2006, and August 22, 2006.
- (c) Based on the facts, conditions, and evaluations made, the OAQ staff recommends to the IDEM's Commissioner that the New Source Review and Part 70 Permit No. 039-23644-00518 be approved.
- (d) Copies of the preliminary findings have been provided to the Nappanee Public Library.

IDEM Contact

Questions regarding this proposed permit can be directed to Mr. Nathan Bell at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-3350 or toll free at 1-800-451-6027 extension 4-3350.

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

Addendum to the Technical Support Document (TSD) for a
FESOP Transitioning to a Part 70 Permit
with New Source Review (NSR)

Source Description and Location
--

Source Name:	Kountry Wood Products, LLC
Source Location:	500 E Wabash Avenue, Nappanee, Indiana 46550
County:	Elkhart
SIC Code:	2434 (Manufacturing of Wood Kitchen Cabinets)
NSR and Part 70 Operating Permit No.:	T039-23644-00518
Permit Writer:	Nathan C. Bell

On October 29, 2006, the Office of Air Quality (OAQ) had a notice published in The Elkhart Truth, Elkhart, Indiana, stating that Kountry Wood Products, LLC had applied to transition from a Federally Enforceable State Operating Permit (FESOP) to a Part 70 Operating Permit in order to construct and operate a new automated cabinet finishing line at their existing stationary wood processing and finishing plant. The notice also stated that the OAQ proposed to issue a Part 70 Operating 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.

Comments and Responses

No comments were received during the public notice period.

Additional Changes To Permit

IDEM, OAQ has decided to make the following additional revisions to the permit.

- (a) Pursuant to 40 CFR 63.2 and 40 CFR 63.800(g), the wood furniture coating operations (new automated cabinet finishing line and the existing Spray Booth 2) are considered a new source, since removal of existing Spray Booth 1 and construction of the new automated cabinet finishing line would be considered reconstruction, as defined by 40 CFR 63.2, of the wood furniture coating operation. Based on information provided by the source, the fixed capital cost of the new automated cabinet finishing line exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source and it is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) for new sources established pursuant to section 112 of the Clean Air Act.

Based on the above determination, the requirements for an existing affected source under 40 CFR 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing, have been replaced with the requirements for a new affected source as follows:

The wood furniture coating operations (new automated cabinet finishing line and the existing Spray Booth 2) are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (40 CFR 63.800 - 63.808), which is incorporated by reference as 326 IAC 20-14-1, because this facility engages in the manufacture of wood furniture or wood furniture components and is located at a plant site that is a major source of HAPs as defined in 40 CFR 63.2.

The new automated cabinet finishing line and the existing Spray Booth 2 are considered part of a new affected source and must comply with the provisions of 40 CFR 63, Subpart JJ, immediately upon startup.

Nonapplicable portions of the NESHAP will not be included in the permit.

The new automated cabinet finishing line and the existing Spray Booth 2 are subject to the following portions of Subpart JJ.

- (1) 40 CFR 63.800(a), (b), (c), (d), and (f)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(b)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804(d)(1), (2), and (4), (e)(1), (f)(1), (2), (3), (5), (7), and (8), and (g)(1), (2), (3), (5), (7), and (8)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806(a), (b), (c), (d), (e), (h), (i), and (j)
- (8) 40 CFR 63.807(a), (b), (c) and (e)
- (9) 40 CFR 63.808

The provisions of 40 CFR 63 Subpart A - General Provisions which are incorporated as 326 IAC 20-1-1, apply to the automated cabinet finishing line and Spray Booth 2 except when otherwise specified in 40 CFR 63, Subpart JJ.

- (b) The rule citations for Conditions D.1.4 and D.2.2 have been corrected.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The permit is revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**.

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:

- (a) one (1) surface coating spray booth, identified as Spray Booth 2, approved for construction in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered **part of the new** ~~an existing~~ affected source.

- (b) one (1) automated cabinet finishing line, approved for construction in 2006, including the following equipment:

...

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered **a-part of the** new affected source.

...

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Spray Booth 2 and Automated Cabinet Finishing Line

- (a) one (1) surface coating spray booth, identified as Spray Booth 2, approved for construction in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered **part of the new** ~~an existing~~-affected source.

- (b) one (1) automated cabinet finishing line, approved for construction in 2006, including the following equipment:

...

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered ~~a~~**part of the** new affected source.

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

...

D.1.4 Preventive Maintenance Plan [~~326 IAC 2-8-4(9)~~]**[326 IAC 2-7-5(13)]**

...

D.1.10 Wood Furniture Manufacturing Requirements [40 CFR Part 63, Subpart JJ]**[326 IAC 20-14-1]**

...

§ 63.802 Emission limits.

~~(a) Each owner or operator of an existing affected source subject to this subpart shall:~~

~~(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in §63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in §63.803(l)(2) for determining styrene and formaldehyde usage.~~

~~(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:~~

~~(i) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or~~

~~(ii) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented in paragraph (a)(2)(i) of this section, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.~~

~~(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.~~

...

§ 63.804 Compliance procedures and monitoring requirements.

~~(a) The owner or operator of an existing affected source subject to §63.802(a)(1) shall comply with those provisions using any of the methods presented in §63.804 (a)(1) through (a)(4).~~

~~(1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;~~

$$E = \frac{(Mc1 Cc1 + Mc2 Cc2 + * * * + Mcn Ccn + S1 W1 + S2 W2 + * * * Sn Wn)}{(Mc1 + Mc2 + * * * + Mcn)} \text{ Equation 1}$$

~~(2) Use compliant finishing materials according to the following criteria:~~

~~(i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;~~

~~(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and~~

~~(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.~~

~~(4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.~~

~~(b) The owner or operator of an affected source subject to §63.802(a)(2)(i) shall comply with the provisions by using compliant foam adhesives with a VHAP content no greater than 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied.~~

~~(c) The owner or operator of an affected source subject to §63.802(a)(2)(ii) shall comply with those provisions by using either of the methods presented in §63.804 (c)(1) and (c)(2).~~

~~(1) Use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied; or~~

...

Table 3 to Subpart JJ of Part 63 - Summary of Emission Limits		
Emission Point	Existing Source	New Source
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	1.0 ^(a)	0.8 ^(a)
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied		
-stains.....	1.0 ^(a)	1.0 ^(a)
-washcoats.....	1.0 ^{(a)(b)}	0.8 ^{(a)(b)}
-sealers.....	1.0 ^(a)	0.8 ^(a)
-topcoats.....	1.0 ^(a)	0.8 ^(a)
-basecoats.....	1.0 ^{(a)(b)}	0.8 ^{(a)(b)}
-enamels.....	1.0 ^{(a)(b)}	0.8 ^{(a)(b)}
-thinners (maximum % HAP allowable); or.....	10.0	10.0
(d) Use any combination of (a) and (b)	1.0	0.8
Cleaning Operations:		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8	0.8
Contact Adhesives:		
(a)..... Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i..... For aerosol adhesives, and for contact adhesives applied to nonporous substrates	NA ^(d)	NA ^(d)
ii..... For foam adhesives used in products that meet flammability requirements.....	1.8	0.2
iii..... For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements) .	1.0	0.2
<p>(a) The limits refer to the VHAP content of the coating, as applied.</p> <p>(b) Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent HAP by weight.</p> <p>(d) There is no limit on the VHAP content of these adhesives</p>		

...
 D.2.2 Preventive Maintenance Plan ~~[326 IAC 1-6-3]~~**[326 IAC 2-7-5(13)]**

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006**

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Category	Pollutant	Existing Emission Units			New Emission Units		TOTAL
		Surface Coating Spray Booth 2	Woodworking Operation	Air Make Up Units and Process Heaters	Automated Cabinet Finishing Line (stain line, sealer line, topcoat line)	Radiant Tube Heaters	
Criteria Pollutants	PM	12.4	307.9	0.04	206.6	5.6E-03	527.01
	PM10	12.4	307.9	0.17	206.6	0.02	527.16
	SO2			0.01		1.8E-03	1.5E-02
	NOx			2.28		0.30	2.58
	VOC	76.4		0.13	1342.9	0.02	1419.43
	CO			1.92		0.25	2.17
Hazardous Air Pollutants	Methanol	10.2			163.9		174.2
	Xylenes	10.2			163.9		174.2
	Methyl isobutyl ketone	3.1			49.2		52.3
	Ethylbenzene	3.1			49.2		52.3
	Chromium			3.2E-05		4.1E-06	3.6E-05
	Manganese			8.7E-06		1.1E-06	9.8E-06
	Nickel			4.8E-05		6.2E-06	5.4E-05
	n-Hexane			0.04		5.3E-03	4.6E-02
	Toluene	10.2		7.8E-05	163.9	1.0E-05	174.2
	Benzene			4.8E-05		6.2E-06	5.4E-05
	Dichlorobenzene			2.7E-05		3.5E-06	3.1E-05
	Formaldehyde	0.51		1.7E-03	8.20	2.2E-04	8.71
	Lead			1.1E-05		1.5E-06	1.3E-05
	Cadmium			2.5E-05		3.3E-06	2.8E-05
Totals		37.4	0.0	0.04	598.4	5.6E-03	635.8
Worse Case HAP							174.2

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Category	Pollutant	Existing Emission Units			New Emission Units		TOTAL
		Surface Coating Spray Booth 2	Woodworking Operation	Air Make Up Units and Process Heaters	Automated Cabinet Finishing Line (stain line, sealer line, topcoat line)	Radiant Tube Heaters	
Criteria Pollutants	PM	0.25	4.96	0.04	4.13	5.6E-03	9.39
	PM10	0.25	4.96	0.17	4.13	0.02	9.53
	SO2			0.01		1.8E-03	1.5E-02
	NOx			2.28		0.30	2.58
	VOC	76.4		0.13	1342.9	0.02	1419.43
	CO			1.92		0.25	2.17
Hazardous Air Pollutants	Methanol	10.2			163.9		174.2
	Xylenes	10.2			163.9		174.2
	Methyl isobutyl ketone	3.1			49.2		52.3
	Ethylbenzene	3.1			49.2		52.3
	Chromium			3.2E-05		4.1E-06	3.6E-05
	Manganese			8.7E-06		1.1E-06	9.8E-06
	Nickel			4.8E-05		6.2E-06	5.4E-05
	n-Hexane			0.04		5.3E-03	4.6E-02
	Toluene	10.2		7.8E-05	163.9	1.0E-05	174.2
	Benzene			4.8E-05		6.2E-06	5.4E-05
	Dichlorobenzene			2.7E-05		3.5E-06	3.1E-05
	Formaldehyde	0.51		1.7E-03	8.20	2.2E-04	8.71
	Lead			1.1E-05		1.5E-06	1.3E-05
	Cadmium			2.5E-05		3.3E-06	2.8E-05
Totals		37.4	0.0	0.04	598.4	5.6E-03	635.8
Worse Case HAP							174.2

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
Surface Coating Spray Booth 2
Volatile Organic Comounds (VOC) and Particulate Matter (PM)

Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006

Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes. Spray Booth 2 will only be able to apply one surface coating at a time. Therefore, the potential to emit (PTE) is calculated assuming that the worst case coating, the topcoat, is apply 8760 hours per year.

Unrestricted Potential to Emit

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10 (lb/hr)	PTE PM/PM10 (tons/yr)	lb VOC per gal solids	Transfer Efficiency
Stain Line																					
Cinnamon Maple Stain (ST-1320)	Wood	7.16	87.51%	23.58%	12.49%	63.93%	25.00%	5.28%	0.0150	50	18.0	5.4	6.11	4.58	3.4	82.4	15.05	0.23	1.0	86.74	65%
Sealer Line																					
Sealer (DANSPEED S/S Semi-Gloss 424-4451)		7.93	67.11%	0.03%	32.89%	67.08%	0.02%	25.22%	0.0590	50	70.8	23.4									
Sealer Catalyst (873-0870)		7.42	82.00%	1.95%	18.00%	80.05%	1.90%	12.00%	0.0059	50	7.1	2.2									
Sealer (as applied)	Wood	7.88	68.38%	0.19%	31.62%	68.19%	0.19%	24.02%	0.0649	50	77.9	25.6	5.39	5.38	17.4	419	76.41	2.8	12.4	22.38	65%
Topcoat Line																					
Topcoat (DANSPEED S/S Semi-Gloss 424-4451)		7.93	67.11%	0.03%	32.89%	67.08%	0.02%	25.22%	0.0590	50	70.8	23.4									
Topcoat Catalyst (873-0870)		7.42	82.00%	1.95%	18.00%	80.05%	1.90%	12.00%	0.0059	50	7.1	2.2									
Topcoat (as applied)	Wood	7.88	68.38%	0.19%	31.62%	68.19%	0.19%	24.02%	0.0649	50	77.9	25.6	5.39	5.38	17.4	419	76.41	2.8	12.4	22.38	65%

METHODOLOGY

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]
 Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hour/day]
 Pounds of VOC per Gallon Coating less Water and non-VOCs = [Density (lb/gal)] * [Weight % VOCs] / [1 - (Volume % water and non-VOCs)]
 Pounds of VOC per Gallon Coating = [Density (lb/gal)] * [Weight % VOCs]
 PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOCs]
 PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]
 PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]
 PTE of PM/PM10 (tons/yr) = [Density (lb/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency] * [365 days/yr] * [1 ton/2000 lbs]
 Pounds VOC per Gallon of Solids = [Density (lb/gal)] * [Weight % VOCs] / [Volume % solids]
 Controlled PTE = [Uncontrolled PTE] * [1 - Control Efficiency]
 Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/hour)] * [Actual Hours of Operation (hours/day)]

Worst Case Coating PTE (Uncontrolled) =	17.4	419	76	2.8	12.4
Actual Emissions based on 8 hours per day =	17.4	140			
			Dry Filter Control Efficiency =	98.0%	
			Worst Case Coating PTE (After Controls) =	0.057	0.248

**Appendix A: Emissions Calculations
Surface Coating Spray Booth 2
Hazardous Air Pollutants (HAPs)**

**Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006**

Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes. Spray Booth 2 will only be able to apply one surface coating at a time. Therefore, the potential to emit (PTE) is calculated assuming that the worst case coating, the topcoat, is apply 8760 hours per year.

Unrestricted Potential to Emit

Operation and Material	Maximum Usage (lb/hr)	Weight % MeOH	MeOH Emissions (tons/yr)	Weight % Xylenes	Xylenes Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)	Weight % MIBK	MIBK Emissions (tons/yr)	Weight % EB	EB Emissions (tons/yr)	Weight % HCOH	HCOH Emissions (tons/yr)	Total (tons/yr)
Stain Line														
Cinnamon Maple Stain (ST-1320)	5.4	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0.0
Sealer Line														
Sealer (DANSPEED S/S Semi-Gloss 424-4451)	23.4	10.0%		10.0%		10.0%		3.0%		3.0%		0.5%		
Sealer Catalyst (873-0870)	2.2	0%		0%		0%		0%		0%		0%		
Sealer (as applied)	25.6	9.14%	10.2	9.14%	10.2	9.14%	10.2	2.74%	3.1	2.74%	3.1	0.46%	0.51	37.4
Topcoat Line														
Topcoat (DANSPEED S/S Semi-Gloss 424-4451)	23.4	10.0%		10.0%		10.0%		3.0%		3.0%		0.5%		
Topcoat Catalyst (873-0870)	2.2	0%		0%		0%		0%		0%		0%		
Topcoat (as applied)	25.6	9.14%	10.2	9.14%	10.2	9.14%	10.2	2.74%	3.1	2.74%	3.1	0.46%	0.51	37.4
Worst Case Coating			10.2		10.2		10.2		3.1		3.1		0.51	37.4

METHODOLOGY

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

ACRONYMS

MeOH = Methanol

MIBK = methyl isobutyl ketone

EB = ethylbenzene

HCOH = formaldehyde

**Appendix A: Emissions Calculations
Woodworking Operation**

Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006

Control Equipment Description	PM/PM10 Collection Efficiency (%)	Exhaust Flow Rate (acfm)	Outlet Grain Loading (grains/cf)	Controlled PTE of PM/PM10 (lbs/hr)	Controlled PTE of PM/PM10 (tons/yr)	Uncontrolled PTE of PM/PM10 (lbs/hr)	Uncontrolled PTE of PM/PM10 (tons/yr)
Baghouse	98.39%	48250	0.002737	1.13	4.96	70.31	307.95
Totals				1.13	4.96	70.31	307.95

Methodology

Potential Controlled Emissions (lbs/hr) = Outlet Loading (grains/cf) * Exhaust Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr

Potential Uncontrolled Emissions (lbs/hr) = Potential Controlled Emissions (lbs/hr) / (1 - Control Efficiency)

Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hr/yr * 1 ton/2,000 lbs

Compliance with 326 IAC 6-3-2:

Allowable Emissions, $E = 4.10 * P^{0.67}$ (for weight rates up to 60,000 lb/hr)	
where	E = emissions in lbs/hr
	P = process weight in tons/hr
	P = 650 lbs/hr
	= 0.325 tons/hr
Allowable PM Emissions, E =	1.93 lbs/hr
	= 46.3 lbs/day
	= 8.46 tons/yr
The use of baghouses ensure compliance with the allowable emission rate.	

**Appendix A: Emissions Calculations
Air Make-Up Units and Process Heaters
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006**

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr					
					PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMCF)					1.9	7.6	0.6	100	5.5	84.0
Air Make-Up Unit	1	3.0	3.000	26.28	2.5E-02	0.100	7.9E-03	1.314	0.072	1.104
Air Make-Up Unit	1	1.0	1.000	8.76	8.3E-03	0.033	2.6E-03	0.438	0.024	0.368
Process Heaters	9	0.108	0.972	8.51	8.1E-03	0.032	2.6E-03	0.426	0.023	0.358
Process Heaters	1	0.240	0.240	2.10	2.0E-03	0.008	6.3E-04	0.105	0.006	0.088
Totals	12		5.21		4.3E-02	0.173	0.014	2.283	0.126	1.918

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Emission Unit	Potential Emission tons/yr									
Air Make-Up Unit	2.8E-05	1.6E-05	9.9E-04	2.4E-02	4.5E-05	6.6E-06	1.4E-05	1.8E-05	5.0E-06	2.8E-05
Air Make-Up Unit	9.2E-06	5.3E-06	3.3E-04	7.9E-03	1.5E-05	2.2E-06	4.8E-06	6.1E-06	1.7E-06	9.2E-06
Process Heaters	8.9E-06	5.1E-06	3.2E-04	7.7E-03	1.4E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	8.9E-06
Process Heaters	2.2E-06	1.3E-06	7.9E-05	1.9E-03	3.6E-06	5.3E-07	1.2E-06	1.5E-06	4.0E-07	2.2E-06
Totals	4.8E-05	2.7E-05	1.7E-03	4.1E-02	7.8E-05	1.1E-05	2.5E-05	3.2E-05	8.7E-06	4.8E-05

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

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

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

Methodology

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

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

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter

NOx = Nitrous Oxides

DCB = Dichlorobenzene

Cr = Chromium

PM10 = Particulate Matter (<10 um)

VOC = Volatile Organic Compounds

Pb = Lead

Mn = Manganese

SO2 = Sulfur Dioxide

CO = Carbon Monoxide

Cd = Cadmium

Ni = Nickel

**Appendix A: Emissions Calculations
Automated Cabinet Finishing Line
Stain Line, Sealer Line, and Topcoat Line
Volatile Organic Comounds (VOC) and Particulate Matter (PM)**

**Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006**

Unrestricted Potential to Emit

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10 (lb/hr)	PTE PM/PM10 (tons/yr)	lb VOC per gal solids	Transfer Efficiency
Stain Line																					
Cinnamon Maple Stain (ST-1320)	Wood	7.16	87.51%	23.58%	12.49%	63.93%	25.00%	5.28%	0.0150	400	144.0	43.0	6.11	4.58	27.5	659.5	120.36	1.9	8.2	86.74	65%
Sealer Line																					
Sealer (DANSPEED S/S Semi-Gloss 424-4451)		7.93	67.11%	0.03%	32.89%	67.08%	0.02%	25.22%	0.0590	400	566.4	187.1									
Sealer Catalyst (873-0870)		7.42	82.00%	1.95%	18.00%	80.05%	1.90%	12.00%	0.0059	400	56.6	17.5									
Sealer (as applied)	Wood	7.88	68.38%	0.19%	31.62%	68.19%	0.19%	24.02%	0.0649	400	623.0	204.7	5.39	5.38	139.6	3349	611.26	22.6	99.2	22.38	65%
Topcoat Line																					
Topcoat (DANSPEED S/S Semi-Gloss 424-4451)		7.93	67.11%	0.03%	32.89%	67.08%	0.02%	25.22%	0.0590	400	566.4	187.1									
Topcoat Catalyst (873-0870)		7.42	82.00%	1.95%	18.00%	80.05%	1.90%	12.00%	0.0059	400	56.6	17.5									
Topcoat (as applied)	Wood	7.88	68.38%	0.19%	31.62%	68.19%	0.19%	24.02%	0.0649	400	623.0	204.7	5.39	5.38	139.6	3349	611.26	22.6	99.2	22.38	65%

METHODOLOGY

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]
 Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hour/day]
 Pounds of VOC per Gallon Coating less Water and non-VOCs = [Density (lb/gal)] * [Weight % VOCs] / [1 - (Volume % water and non-VOCs)]
 Pounds of VOC per Gallon Coating = [Density (lb/gal)] * [Weight % VOCs]
 PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOCs]
 PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]
 PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]
 PTE of PM/PM10 (tons/yr) = [Density (lb/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency] * [365 days/yr] * [1 ton/2000 lbs]
 Pounds VOC per Gallon of Solids = [Density (lb/gal)] * [Weight % VOCs] / [Volume % solids]
 Controlled PTE = [Uncontrolled PTE] * [1 - Control Efficiency]
 Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/hour)] * [Actual Hours of Operation (hours/day)]

Total Uncontrolled Potential to Emit (PTE) =	306.6	7358	1343	47.2	206.6
Actual Emissions based on 8 hours per day =	306.6	2453			

Dry Filter Control Efficiency =	98.0%	
Stain Line PM/PM10 Emissions after controls/limits =	0.038	0.165
Sealer Line PM/PM10 Emissions after controls/limits =	0.453	1.984
Topcoat Line PM/PM10 Emissions after controls/limits =	0.453	1.984

Total Controlled/Limited PTE of PM/PM10 (tons/yr) =	0.943	4.132
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**Appendix A: Emissions Calculations
Automated Cabinet Finishing Line
Stain Line, Sealer Line, and Topcoat Line
Hazardous Air Pollutants (HAPs)**

**Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006**

Unrestricted Potential to Emit

Operation and Material	Maximum Usage (lb/hr)	Weight % MeOH	MeOH Emissions (tons/yr)	Weight % Xylenes	Xylenes Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)	Weight % MIBK	MIBK Emissions (tons/yr)	Weight % EB	EB Emissions (tons/yr)	Weight % HCOH	HCOH Emissions (tons/yr)	Total (tons/yr)
Stain Line														
Cinnamon Maple Stain (ST-1320)	43.0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0.0
Sealer Line														
Sealer (DANSPEED S/S Semi-Gloss 424-4451)	187.1	10.0%		10.0%		10.0%		3.0%		3.0%		0.5%		
Sealer Catalyst (873-0870)	17.5	0%		0%		0%		0%		0%		0%		
Sealer (as applied)	204.7	9.14%	82.0	9.14%	82.0	9.14%	82.0	2.74%	24.6	2.74%	24.6	0.46%	4.1	299.2
Topcoat Line														
Topcoat (DANSPEED S/S Semi-Gloss 424-4451)	187.1	10.0%		10.0%		10.0%		3.0%		3.0%		0.5%		
Topcoat Catalyst (873-0870)	17.5	0%		0%		0%		0%		0%		0%		
Topcoat (as applied)	204.7	9.14%	82.0	9.14%	82.0	9.14%	82.0	2.74%	24.6	2.74%	24.6	0.46%	4.1	299.2
Totals			163.9		163.9		163.9		49.2		49.2		8.2	598.4

METHODOLOGY

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

ACRONYMS

MeOH = Methanol
MIBK = methyl isobutyl ketone
EB = ethylbenzene
HCOH = formaldehyde

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

**Company Name: Kountry Wood Products LLC
Address City IN Zip: 500 E Wabash Avenue, Nappanee, Indiana 46550
NSR and Part 70 Operating Permit No.: 039-23644-00518
Reviewer: Nathan C. Bell
Date: October 4, 2006**

		Pollutant			PM*	PM10*	SO2	NOx**	VOC	CO
		Emission Factor (lb/MMCF)			1.9	7.6	0.6	100	5.5	84.0
Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr					
					PM*	PM10*	SO2	NOx**	VOC	CO
Radiant Tube Heater ISA-1	1	0.125	0.125	1.10	1.0E-03	0.004	3.3E-04	0.055	0.003	0.046
Radiant Tube Heater ISA-2	1	0.125	0.125	1.10	1.0E-03	0.004	3.3E-04	0.055	0.003	0.046
Radiant Tube Heater ISA-3	1	0.125	0.125	1.10	1.0E-03	0.004	3.3E-04	0.055	0.003	0.046
Radiant Tube Heater ISA-4	1	0.150	0.150	1.31	1.2E-03	0.005	3.9E-04	0.066	0.004	0.055
Radiant Tube Heater ISA-5	1	0.150	0.150	1.31	1.2E-03	0.005	3.9E-04	0.066	0.004	0.055
Totals	5		0.68		5.6E-03	0.022	0.002	0.296	0.016	0.248

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Emission Unit	Potential Emission tons/yr									
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Radiant Tube Heater ISA-1	1.1E-06	6.6E-07	4.1E-05	9.9E-04	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Tube Heater ISA-2	1.1E-06	6.6E-07	4.1E-05	9.9E-04	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Tube Heater ISA-3	1.1E-06	6.6E-07	4.1E-05	9.9E-04	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Tube Heater ISA-4	1.4E-06	7.9E-07	4.9E-05	1.2E-03	2.2E-06	3.3E-07	7.2E-07	9.2E-07	2.5E-07	1.4E-06
Radiant Tube Heater ISA-5	1.4E-06	7.9E-07	4.9E-05	1.2E-03	2.2E-06	3.3E-07	7.2E-07	9.2E-07	2.5E-07	1.4E-06
Totals	6.2E-06	3.5E-06	2.2E-04	5.3E-03	1.0E-05	1.5E-06	3.3E-06	4.1E-06	1.1E-06	6.2E-06

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

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

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

Methodology

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

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

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter

NOx = Nitrous Oxides

DCB = Dichlorobenzene

Cr = Chromium

PM10 = Particulate Matter (<10 um)

VOC = Volatile Organic Compounds

Pb = Lead

Mn = Manganese

SO2 = Sulfur Dioxide

CO = Carbon Monoxide

Cd = Cadmium

Ni = Nickel