



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
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TO: Interested Parties / Applicant

DATE: January 17, 2008

RE: Jasper Seating Company, Inc. - Plant #4 / 117-24008-00026

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Jasper Seating Co., Inc., Plt. #4
1352 West Hospital Road
Paoli, Indiana 47454**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F117-24008-00026	
Issued by: <i>Original signed by A.C. Dumauval</i> Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: January 17, 2008 Expiration Date: January 17, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood furniture and cabinet coating plant.

Source Address:	1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address:	PO Box 231, Jasper, Indiana 47546
General Source Phone Number:	(812) 482-3204
SIC Code:	2521
County Location:	Orange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Six (6) spray coating booths, identified as PB01, PB02, PB03, PB04, PB05, and PB06, each with a maximum process rate of 1,600 pounds of wood furniture per hour and equipped with either air assisted airless or high volume low pressure (HVLP) spray guns, using dry filters for overspray control of particulates, constructed in 2002.
- (b) One (1) wipe coating operation, with a maximum usage of 0.50 pounds of filler per hour, constructed in 2002.
- (c) One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat), with a maximum usage rate of 16.50 gallons per hour, constructed in 2005.
- (d) Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters and exhausting at stacks S18 and S19, respectively, constructed in 2005.
- (e) One (1) wood working shop, identified as WW1, with a maximum throughput rate of 2,000 pounds of wood pieces per hour, using a baghouse as control and exhausting at stack S17, constructed in 2005.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Three (3) natural gas-fired ovens:

- (A) Oven 1, with a rating of 0.80 MMBtu per hour, exhausting to stacks S6 and S7;
 - (B) Oven 2, with a rating of 0.80 MMBtu per hour, exhausting to stacks S9 and S10;
 - (C) Oven 3, with a rating of 1.60 MMBtu per hour, exhausting to stacks S15 and S16.
- (2) Space Heaters:
- (A) Two (2) natural gas-fired units rated at 1.30 MMBtu per hour;
 - (B) One (1) natural gas-fire make up air unit, rated at 8.0 MMBtu per hour.
- (b) Electric infrared cure equipment
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) The application of 3M Super 77 Spray Adhesive, identified as Shipping Adhesive, with a maximum application rate of 0.375 pounds per hour [326 IAC 6-3-2].

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F117-24008-00026, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

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

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

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to F117-24008-00026 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue

MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

C.8 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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:

- (a) Six (6) spray coating booths, identified as PB01, PB02, PB03, PB04, PB05, and PB06, each with a maximum process rate of 1,600 pounds of wood furniture per hour and equipped with either air assisted airless or high volume low pressure (HVLP) spray guns, using dry filters for overspray control of particulates, constructed in 2002.
- (b) One (1) wipe coating operation, with a maximum usage of 0.50 pounds of filler per hour, constructed in 2002.
- (c) One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat), with a maximum usage rate of 16.50 gallons per hour, constructed in 2005.
- (d) Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters and exhausting at stacks S18 and S19, respectively, constructed in 2005.

(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 2-8-4(1)]

D.1.1 FESOP [326 IAC 2-8-4] [326 IAC 2-2]

- (a) The amount of VOC delivered to the roll-coating operation, the spray coating booths, the wipe coating operation, and their associated clean-up activities shall not exceed a total of 98.43 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to the roll-coating operation, the spray coating booths, the wipe coating operation, and the amount of any single HAP used for clean-up shall be limited to 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to the roll-coating, the spray coating booths, the wipe coating operation, and the amount of any combination of HAPs used for clean-up shall not exceed 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The PM and PM₁₀ emissions from the six (6) spray coating booths shall not exceed 10.8 pounds per hour.
- (e) The PM and PM₁₀ emissions from the two (2) off-line spray coating booths shall not exceed 0.42 pounds per hour.

Combined with the emissions from the wood working shop (as given in D.2) and insignificant activities, the VOC and PM₁₀ emissions from the entire source are limited to less than 100 tons per year each, PM is limited to less than 250 tons per year, and the HAPs emissions are limited to less than 10 tons per year for any single HAP, and less than 25 tons per year for any combination of HAPs.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

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

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

D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P] [326 IAC 6-3-2]

The particulate from each spray coating booth shall be limited by the following:

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

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and to ensure compliance with Conditions D.1.1(d), D.1.1(e) and D.1.3, the particulate emissions from each spray coating booth shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 VOC and HAP Emissions

- (a) Compliance with the VOC content and input limitations contained in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:
 - (1) On-Site Sampling
 - (A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by

EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

- (B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit F117-24008-00026.
- (C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
- (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:
 - (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
 - (ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

- (2) Certified Waste Report: The VOC reported by analysis of an off-site waste processor may be used, provided the report certifies the amount of VOC in the waste.
- (3) Minimum Assumed VOC content: The VOC content of the waste shipped off site may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the as supplied” and “as applied” VOC data sheets, for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC-containing waste stream and conduct an analysis for VOC content.
- (d) Compliance with the VOC input limitations contained in Condition D.1.1(a) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.
- (e) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC input} = \text{SCL} - \text{SR}$$

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

- (f) Compliance with the HAP input limitations contained in Conditions D.1.1(b) and (c) shall be determined using formulation data supplied by the coating manufacturer.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stacks (S1, S2, S3, S4, S5, S8, S11, S12) while one or more of the booths are in operation.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirement

- (a) To document compliance with Condition D.1.1(a), D.1.1(b), and D.1.1(c) the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits and/or the VOC emission limits established in Condition D.1.1, and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent used on a monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.1.6, then the following records shall be maintained:
- (A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

- (B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
 - (C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.
- (5) The total VOC input for each month; and
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirement

- (a) A quarterly summary of the information to document compliance with the VOC and HAP limits in Condition D.1.1 (a), (b) and (c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) wood working shop, identified as WW1, with a maximum throughput rate of 2,000 pounds of wood pieces per hour, using a baghouse as control and exhausting at stack S17, constructed in 2005.

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

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

D.2.1 Particulate [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD), the potential to emit PM and PM₁₀ shall not exceed 45.6 pounds per hour from the wood working shop.

Compliance with this limit and Condition D.1.1 limits PM and PM₁₀ to less than 250 tons per year and renders 326 IAC 2-2 (PSD) not applicable.

D.2.2 Particulate [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the potential to emit of PM₁₀ shall not exceed 11.4 pounds per hour from the wood working shop.

Compliance with this limit and Condition D.1.1 limits PM₁₀ to less than 100 tons per year and renders 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the wood working shop shall not exceed 4.10 pounds per hour when operating at a process weight rate of 2,000 pounds per hour.

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

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

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

D.2.4 Particulate Control

In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the baghouse for particulate control shall be in operation and control emissions from the wood working shop at all times that the wood working shop is in operation.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.2.6 Visible Emissions Notations

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

D.2.7 Broken or Failed Bag Detection

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Section C - Opacity and Condition D.2.6, the Permittee shall maintain a daily record of visible emission notations of the baghouse exhausts. The Permittee shall include in its daily record when a visible notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) The application of 3M Super 77 Spray Adhesive, identified as Shipping Adhesive, with a maximum application rate of 0.375 pounds per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]**D.3.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shipping adhesive shall be limited by the following:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Jasper Seating Co., Inc., Plt. #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: PO Box 231, Jasper, Indiana 47546
FESOP Permit No.: F117-24008-00026

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Jasper Seating Co., Inc., Plt. #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: PO Box 231, Jasper, Indiana 47546
FESOP Permit No.: F117-24008-00026

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

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc., Plt. #4
 Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
 Mailing Address: PO Box 231, Jasper, Indiana 47546
 FESOP Permit No.: F117-24008-00026
 Facility: Eight (8) spray coating booths, one (1) roll-coating operation, plus one (1) wipe coating operation
 Parameter: Total VOC delivered to the applicators and used for clean-up
 Limit: Less than 98.43 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc., Plt. #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: PO Box 231, Jasper, Indiana 47546
FESOP Permit No.: F117-24008-00026
Facility: Eight (8) spray coating booths, one (1) roll-coating operation, plus one (1) wipe coating operation
Parameter: A single HAP delivered to the applicators and used for clean-up
Limit: Less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc., Plt. #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: PO Box 231, Jasper, Indiana 47546
FESOP Permit No.: F117-24008-00026
Facility: Eight (8) spray coating booths, one (1) roll-coating operation, plus one (1) wipe coating operation
Parameter: Total HAPs delivered to the applicators and used for clean-up
Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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

Source Name: Jasper Seating Co., Inc., Plt. #4
 Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
 Mailing Address: PO Box 231, Jasper, Indiana 47546
 FESOP Permit No.: F117-24008-00026

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 ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State
Operating Permit Renewal

Source Background and Description

Source Name:	Jasper Seating Co., Inc., PLT #4
Source Location:	1352 West Hospital Road, Paoli, Indiana 47454
County:	Orange
SIC Code:	2521
Permit Renewal No.:	F117-24008-00026
Permit Reviewer:	Anne-Marie C. Hart

On December 13, 2007, the Office of Air Quality (OAQ) sent a Public Notice to the Paoli News - Republican stating that Jasper Seating Co., Inc., PLT #4 had applied for a Federally Enforceable State Operating Permit Renewal to operate a wood furniture and cabinet coating plant. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed Federally Enforceable State Operating Permit Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Federally Enforceable State Operating Permit Renewal should be issued as proposed.

On December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-8-4 were finalized allowing for ten (10) year permit terms on FESOP renewals. Condition B.2 has been revised to reflect the ten (10) year permit term.

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

- (a) This permit, F117-24008-00026, is issued for a fixed term of ~~five (5)~~ **Ten (10)** years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

Upon further review, the IDEM, OAQ has made the following changes with new language in **bold** and deleted language in ~~strike through~~:

Change 1:

Operation Permit No.: F117-24008-00026	
Issued by: Nisha Sizemore, Chief Alfred C. Dumaul, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Indiana Department of Environmental Management

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

Source Background and Description

Source Name:	Jasper Seating Co., Inc., PLT #4
Source Location:	1352 West Hospital Road, Paoli, Indiana 47454
County:	Orange
SIC Code:	2521
Permit Renewal No.:	F117-24008-00026
Permit Reviewer:	Anne-Marie C. Hart

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Jasper Seating Co., Inc., PLT #4 relating to the operation of a wood furniture and cabinet coating plant.

History

On November 28, 2006, Jasper Seating Co., Inc., PLT #4 submitted applications to the OAQ requesting to renew its operating permit. Jasper Seating Co., Inc., PLT #4 was issued a FESOP (F117-15446-00026) on August 8, 2002.

Source Definition

Jasper Seating Company owns two (2) plants in Orange County, Indiana:

- (a) Paoli Plant is located at 1352 West Hospital Road, Paoli, Indiana 47454 (Plant ID# 117-00026); and
- (b) French Lick Plant is located at 8084 West County Road 25 South, French Lick, Indiana 47432 (Plant ID # 117-00011).

In order to consider the plants as one major source, all three of the following criteria must be met:

- (1) The plants must have common ownership or common control;
- (2) The plants must have the same two digit SIC code or a support relationship; and
- (3) The plants must be located on contiguous or adjacent properties.

IDEM has determined that these plants are not one major source based on the fact that the two plants are twelve (12) miles apart and not located on contiguous or adjacent properties. Therefore, based on this evaluation these plants will not be considered one (1) major source, as defined by 326 IAC 2-7-1(22).

Permitted Emission Units and Pollution Control Equipment

- (a) Six (6) spray coating booths, identified as PB01, PB02, PB03, PB04, PB05, and PB06, each with a maximum process rate of 1,600 pounds of wood furniture per hour and equipped with either air assisted airless or high volume low pressure (HVLP) spray guns, using dry filters for overspray control of particulates, constructed in 2002.
- (b) One (1) wipe coating operation, with a maximum usage of 0.50 pounds of filler per hour, constructed in 2002.

- (c) One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat), with a maximum usage rate of 16.50 gallons per hour, constructed in 2005.
- (d) Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters and exhausting at stacks S18 and S19, respectively, constructed in 2005.
- (e) One (1) wood working shop, identified as WW1, with a maximum throughput rate of 2,000 pounds of wood pieces per hour, using a baghouse as control and exhausting at stack S17, constructed in 2005.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source also consists of the following emission units that were constructed and/or is operating without a permit:

- (a) The application of 3M Super 77 Spray Adhesive, identified as Shipping Adhesive, with a maximum application rate of 0.375 pounds per hour, in use since 2006. No enforcement action is necessary because the Spray Adhesive is considered an insignificant activity, is not specifically regulated, and does not cause the applicability of any rules not already applicable to the entire source.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Three (3) natural gas-fired ovens:
 - (A) Oven 1, with a rating of 0.80 MMBtu per hour, exhausting to stacks S6 and S7;
 - (B) Oven 2, with a rating of 0.80 MMBtu per hour, exhausting to stacks S9 and S10;
 - (C) Oven 3, with a rating of 1.60 MMBtu per hour, exhausting to stacks S15 and S16.
 - (2) Space Heaters:
 - (A) Two (2) natural gas-fired units rated at 1.30 MMBtu per hour;
 - (B) One (1) natural gas-fire make up air unit, rated at 8.0 MMBtu per hour.
- (b) Electric infrared cure equipment
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

Existing Approvals

Since the issuance of the FESOP F117-15446-00026 on August 9, 2002, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 117-20266-00026 issued on December 23, 2004;

- (b) Significant Permit Revision No. 117-20986-00026 issued on September 12, 2005; and
- (c) Significant Permit Revision No. 117-22127-00026 issued on May 1, 2006.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	PB01	19	2.5	6250	ambient
S2	PB01	19	2.5	6250	ambient
S3	PB02	19	2.5	6250	ambient
S4	PB02	19	2.5	6250	ambient
S5	PB03	19	2.5	6250	ambient
S8	PB04	19	2.5	6250	ambient
S11	PB05	19	2.5	6250	ambient
S12	PB06	19	2.5	6250	ambient

Emission Calculations

See Appendix A (pages 1 through 16) of this document for detailed emission calculations.

County Attainment Status

The source is located in Orange County

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

- (a) Orange County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air

Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Orange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Orange County has been classified as attainment or unclassifiable in Indiana for PM₁₀, CO SO₂ and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	661.66
PM-10	661.56
SO ₂	0.04
VOC	1050.04
CO	5.08
NO _x	6.04

HAPs	tons/year
Toluene	100.60
1-Butanol	20.52
Formaldehyde	2.55
Xylene	44.64
Methanol	23.82
Benzene	0.66
Total	192.93

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM₁₀ and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Wood working shop	*See Below	*See Below	0.00	0.00	0.00	0.00	0.00
Six (6) Spray Booths	<47.4	<47.4	0.00	<98.43	0.00	0.00	Less than 10 for a single HAP and less than 25 for a combination of HAPs.
Wipe Coating Operation	0.00	0.00	0.00		0.00	0.00	
Roll Coating Operation	0.00	0.00	0.00		0.00	0.00	
Two Off-line Spray Coating Booths	<1.86	<1.86	0.00		0.00	0.00	
Shipping Adhesive	0.10	0.00	0.00	1.23	0.00	0.00	
Natural Gas Drying Ovens	0.11	0.11	Negl.	Negl.	1.18	1.40	Negligible
Natural Gas Space Heaters	0.35	0.35	Negl.	0.26	3.90	4.64	Negligible
Total Emissions	<250	<100	Negl.	<100	5.08	6.04	Less than 10 for a single HAP and less than 25 for a combination of HAPs.

* The wood working shop is limited to 45.6 pounds per hour of PM and PM10 (equivalent to 200 tons per year) under the provisions of 326 IAC 2-2 (PSD); to 11.4 pounds per hour of PM10 (equivalent to 50 tons per year) under the provisions of 326 IAC 2-8 (FESOP); and to 4.10 pounds per hour of PM (equivalent to 18 tons per year) under the provisions of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

This source is not one of the 28 source categories and the potential to emit of any regulated pollutant is either less than two hundred fifty (250) tons per twelve (12) consecutive month period or is limited to less than two hundred fifty (250) tons per twelve month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-3 (Emission Offset)

Orange County has been designated as attainment for the 8-hour ozone standard. Therefore, the source is not subject to 326 IAC 2-3 (Emission Offset) at this time.

326 IAC 2-6 (Emission Reporting)

This source is located in Orange County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

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

Pursuant to FESOP No. F117-15446-00026, issued August 9, 2002, the operation of this wood furniture and cabinet coating plant is limited to less than 10 tons per twelve (12) consecutive month period of a single HAP and less than 25 tons per twelve (12) consecutive month period of a combination of HAPs. This limit will render the source not subject to the provisions of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)).

326 IAC 2-8 (FESOP)

The potential VOC and PM₁₀ emissions from the entire facility are greater than 100 tons per year and the potential HAP emissions from the entire source are greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. Pursuant to 326 IAC 2-8-4, the following restrictions are necessary:

- (a) The amount of VOC delivered to all the spray coating booths, the wipe coating operation, the roll coating operation, and their associated clean-up activities shall not exceed 98.43 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The amount of any single HAP delivered to the spray booths, the wipe coating operation, the roll coating operation, and the two off-line spray coating booths plus the amount of any single HAP used for clean-up shall be limited to 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to the spray booths, the wipe coating operation, the roll coating operation, and the two off-line spray coating booths plus the amount of any combination of HAPs used for clean-up shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The total PM₁₀ emissions from the spray booths shall not exceed 47.4 tons per consecutive twelve (12) month period. The use of dry filters with 80% control efficiencies ensures compliance with this limit.

The above limits combined with emissions from the insignificant activities will result in VOC and PM₁₀ emissions from the entire source less than 100 tons per year and HAP emissions less than 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability – Individual Facilities

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

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

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

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

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

The particulate from each spray coating booth shall be limited by the following:

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

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

The dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

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

The particulate from the wood working shop shall be limited by the following:

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

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

$$P = 1 \text{ ton per hour}$$

$$E = 4.10 \text{ pounds per hour}$$

Uncontrolled particulate emission rate for the wood working shop is 4.10 pounds per hour.

The particulate emissions from the wood working shop, after controls, is 1.23 pounds per hour. The wood working shop will be able to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

The baghouse shall be in operation at all times the wood working shop is in operation, in order to comply with this limit.

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

The particulate from the shipping adhesive shall be limited by the following:

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

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

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

The spray coating booths have applicable compliance monitoring conditions as specified below:

- (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 spray coating booth stacks (S1, S2, S3, S4, S5, S8, S11, S12) while one or more of the booths are in operation.
- (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.

The wood working shop has applicable compliance monitoring conditions as specified below:

(1) Visible Emission Notations

- (a) Visible emission notations of the baghouse stack exhaust shall be performed once per day during normal daylight operations. 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.

(2) 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).

Recommendation

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

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

An application for the purposes of this review was received on November 28, 2006.

Conclusion

The operation of this wood furniture and cabinet coating plant shall be subject to the conditions of the attached FESOP Renewal F117-24008-00026.

Appendix A: Emission Calculations

Total Emissions Summary

Company Name: Jasper Seating Co., Inc., Plt #4
 Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
 Permit #: F117-24008-00026
 Reviewer: Anne-Marie C. Hart
 Date: October 1, 2007

Process	tons/year						
	PM	PM ₁₀	SO ₂	VOC	CO	NOx	HAPs
Six (6) Spray Booths (Uncontrolled)							
Paints	118.62	118.62	0.00	942.78	0.00	0.00	179.28
Six (6) Spray Booths (Controlled)							
Paints	23.70	23.70	0.00	942.78	0.00	0.00	179.28
Wipe Coating Operation	0.00	0.00	0.00	8.41	0.00	0.00	0.00
Roll Coating Operation	0.00	0.00	0.00	11.58	0.00	0.00	5.04
Two Off-line Spray Coating Booths							
Off-Line #1	0.93	0.93	0.00	42.85	0.00	0.00	4.24
Off-Line #2	0.93	0.93	0.00	42.85	0.00	0.00	4.24
Woodworking Operation (Uncontrolled)	540.62	540.62	0.00	0.00	0.00	0.00	0.00
Woodworking Operation (Controlled)	5.41	5.41	0.00	0.00	0.00	0.00	0.00
Natural Gas Drying Ovens	0.11	0.11	0.01	0.08	1.18	1.40	0.03
Natural Gas Space Heaters	0.35	0.35	0.03	0.26	3.90	4.64	0.09
Shipping Adhesive	0.10	0.00	0.00	1.23	0.00	0.00	0.02
Total Uncontrolled Emissions	661.66	661.56	0.04	1050.04	5.08	6.04	192.93
Total Controlled Emissions	31.53	31.43	0.04	1050.04	5.08	6.04	192.93

Appendix A: Emission Calculations
VOC and PM Emissions from Six (6) Spray Booths
Company Name: Jasper Seating Co., Inc., Plt #4
Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Type of Coating	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % VOC	Maximum Usage (gal/hour)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (tons/year)	*PM/PM10 Potential (lb/hr)	PM/PM10 Potential (ton/year)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/year)
NGR	6.77	99.00%	0.0%	99.0%	2.00	6.70	13.40	58.71	0.05	0.21	65%	80%	0.01	0.04
Wash Coat	7.09	92.00%	0.0%	92.0%	5.50	6.52	35.88	157.13	1.09	4.78	65%	80%	0.22	0.96
Lacquer Sealer	7.82	68.71%	0.0%	68.7%	4.00	5.37	21.49	94.14	3.43	15.00	65%	80%	0.69	3.00
Stain	6.67	99.00%	0.0%	99.0%	2.00	6.60	13.21	57.84	0.05	0.20	65%	80%	0.01	0.04
Catalyzed Lacquer	7.82	58.77%	0.0%	58.8%	4.00	4.60	18.38	80.52	4.51	19.77	65%	80%	0.90	3.95
**Worst case for one booth								157.13	4.51	19.77			0.90	3.95

* Assume all PM emissions are PM10 emissions

** Only one type of coating is applied in one booth at one time. Therefore, the worst case VOC or PM/PM10 emissions are the maximum VOC or PM/PM10 emissions among these five paints

Methodology

Weight % VOC = Weight % Volatile - Weight % Water

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

Potential VOC (lbs/hr) = Pounds VOC per Gallon coating (lb/gal) x Maximum Usage (gal/hr)

Potential VOC (tons/year) = Potential VOC (lbs/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

Potential PM/PM10 (lb/hr) = Maximum Usage (gal/hr) x Density (lb/gal) x (1-Weight % Volatile) x (1-Transfer efficiency)

Potential PM/PM10 (tons/year) = Potential PM/PM10 (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

Potential to Emit PM/PM10 (lb/hr) = Potential PM/PM10 (lb/hr) x (1-PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/year) = Potential to Emit PM/PM10 (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

Appendix A: Emission Calculations**Total VOC and PM/PM10 Emissions from Paints****Company Name: Jasper Seating Co., Inc., Plt #4****Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454****Permit #: F117-24008-00026****Reviewer: Anne-Marie C. Hart****Date: October 1, 2007**

Material	Uncontrolled VOC Emissions (tons/year)	Potential to Emit VOC (tons/year)*	Uncontrolled PM/PM10 Emissions (ton/year)	Potential to Emit PM/PM10 (tons/year)*
Paints	157.13	157.13	19.77	3.95
Total for Each Booth	157.13	157.13	19.77	3.95
Total for 6 Booths	942.78	942.78	118.62	23.7

*Potential to Emit after controls

Appendix A: Emission Calculations
HAP Emissions from Six (6) Spray Coating Booths
Company Name: Jasper Seating Co., Inc., Plt #4
Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Material	Density (lb/gal)	Maximum Usage (gal/hour)	Weight % Toluene	Toluene Emissions (tons/year)	Weight % 1-Butanol	1-Butanol Emissions (tons/year)	Weight % Formaldehyde	Formaldehyde Emissions (tons/year)	Weight % Xylene	Xylene Emissions (tons/year)	Weight % Methanol	Methanol Emissions (tons/year)
NGR	6.77	2.0	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00
Wash Coat	7.09	5.5	9.0%	15.37	2.0%	3.42	0.1%	0.17	0.0%	0.00	0.0%	0.00
Lacquer Sealer	7.82	4.0	4.9%	6.71	0.0%	0.00	0.3%	0.41	4.9%	6.71	2.9%	3.97
Stain	6.67	2.0	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00
Catalyzed Lacquer	7.82	4.0	0.0%	0.00	0.0%	0.00	0.0%	0.00	1.9%	2.60	1.9%	2.60
*Worst case HAPs for One Booth				15.37		3.42		0.41		6.71		3.97

*Only one type of coating is applied in one booth at one time. Therefore, the worst case HAP emissions are the maximum HAP emissions among these five paints

Methodology

HAP Emission rate (tons/year) = Density (lb/gal) x Maximum Usage (gal/hr) x Weight % HAP x 8760 hr/year x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from Paints
Company Name: Jasper Seating Co., Inc., Plt #4
Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Material	Toluene Emissions (tons/year)	1-Butanol Emissions (tons/year)	Formaldehyde Emissions (tons/year)	Xylene Emissions (tons/year)	Methanol Emissions (tons/year)
Paints	15.37	3.42	0.41	6.71	3.97
Total for each booth	15.37	3.42	0.41	6.71	3.97
Total for 6 Booths	92.22	20.52	2.46	40.26	23.82

Total HAP Emissions (tons/year) = 179.28

Appendix A: Emisison Calculations
VOC Emissions From Wipe Coating Operation
Company Name: Jasper Seating CO., Inc., Plt #4
Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % VOC	Maximum Usage (gal/hour)	Pounds of VOC per gallon of Coating	Potential VOC (lb/hr)	Potential VOC (tons/year)
Filler	11.23	34.19%	0.00%	34.19%	0.50	3.84	1.92	8.41

Total VOC (tons/year) = 8.41

Methodology

Weight % VOC = Weight % Volatile - Weight % Water

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

Potential VOC (lb/hr) = Pounds VOC per Gallon of Coating (lb/gal) x Maximum Usage (gal/hr)

Potential VOC (tons/year) = Potential VOC (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

Appendix A: Emission Calculations
VOC and PM Emissions from Roll Coating Operation and Off Line Spray Coats 1 and 2
Company Name: Jasper Seating Co., Inc., Plt #4
Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Process Booth ID	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gallons of Material (gal/hr)	Pounds VOC per gallon of Coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/year)	PTE of PM/PM10 (tons/year)	Transfer Efficiency
Flat Line UV Coat	Stain	9.37	0.6%	0.0%	0.6%	0.0%	99.2%	5.50	0.06	0.31	7.42	1.35	0.00	100%
	Sealer	9.69	1.1%	0.0%	1.1%	0.0%	98.7%	5.50	0.11	0.59	14.07	2.57	0.00	100%
	Topcoat	9.09	3.5%	0.0%	3.5%	0.0%	95.5%	5.50	0.32	1.75	42.00	7.66	0.00	100%
Off Line 1 Spray Coat	*Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	1.50	6.52	9.78	234.82	42.85	0.93	75%
Off Line 2 Spray Coat	*Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	1.50	6.52	9.78	234.82	42.85	0.93	75%
Total												97.30	1.86	

* Washcoat is worst case coating

Methodology

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

PTE of VOC (lbs/hr) = Pounds of VOC per gallon of Coating (lb/gal) x Gallons of Material (gal/hr)

PTE of VOC (lbs/day) = PTE of VOC (lbs/hr) x 24 (hr/day)

PTE of VOC (tons/year) = PTE of VOC (lbs/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

PTE of PM/PM10 (tons/year) = Gallons of Material (gal/hr) x Density (lbs/gal) x (1-Weight % Volatile) x (1-Transfer Efficiency) x 8760 (hr/year) x (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions from Roll Coating Operation and Off Line Spray Coats 1 and 2
Company Name: Jasper Seating Co., Inc., Plt #4
Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Process Booth ID	Material	Density (lb/gal)	Gallons of Material (gal/hr)	Weight % Ethyl Benzene	Weight % Toluene	Weight % Xylene	Weight % Formaldehyde	PTE of Ethyl Benzene (tons/year)	PTE of Toulene (tons/year)	PTE of Xylene (tons/year)	PTE of Formaldehyde (tons/year)
Flat Line UV Coating	Stain	9.37	5.5	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
	Sealer	9.69	5.5	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
	Topcoat	9.09	5.5	0.30%	0.00%	2.00%	0.00%	0.66	0.00	4.38	0.00
Off Line 1 Spray Coat	*Washcoat	7.09	1.5	0.00%	9.00%	0.00%	0.10%	0.00	4.19	0.00	0.05
Off Line 2 Spray Coat	*Washcoat	7.09	1.5	0.00%	9.00%	0.00%	0.10%	0.00	4.19	0.00	0.05
Total								0.66	8.38	4.38	0.09

Total PTE HAPs (tons/year) = 13.51

* Washcoat is the worst case coating

Methodology

PTE HAPs (tons/year) = Density (lb/gal) x Gallons of Material (gal/hr) x Weight % HAP x 8760 (hr/year) x (1 ton/2000 lbs)

Appendix A: Emission Calculations
Particulate Emissions from Woodworking Operations
Company Name: Jasper Seating Co., Inc., Plant #4
Address City, IN Zip: 1352 West Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Grain Loading (gr/acf)	Air Flow Rate (acf/min)	Control Efficiency
0.003	48,000	99%

Potential to Emit Particulate

After Controls (lb/hr)	After Controls (ton/year)	Before Controls (lb/hr)	Before Controls (ton/year)
1.23	5.41	123.43	540.62

Assume all PM emissions are equal to PM10

Methodology

Potential to Emit After Controls (lb/hr) = Grain Loading (gr/acf) x Air Flow Rate (acf/min) x 60 (min/hr) x (1 lb/7000 gr)

Potential to Emit After Controls (ton/year) = Potential to Emit (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

Potential to Emit Before Controls (lb/hr) = Potential to Emit After Controls (lb/hr) / (1-Control Efficiency)

Potential to Emit Before Controls (ton/year) = Potential to Emit After Controls (ton/year) / (1-Control Efficiency)

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Drying Ovens 0.80, 0.80, and 1.60 MMBtu/hr

Company Name: Jasper Seating Co., Inc., Plt. #4

Address City IN Zip: 1352 West Hospital Road, Paoli, Indiana 47454

Permit Number: F117-24008-00026

Reviewer: Anne-Marie C. Hart

Date: October 1, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.2

28.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.11	0.11	0.01	1.40	0.08	1.18

*PM emission factor is total PM. 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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Drying Ovens 0.80, 0.80, and 1.60 MMBtu/hr
HAPs Emissions**

Company Name: Jasper Seating Co., Inc., Plt. #4
Address City IN Zip: 1352 West Hospital Road, Paoli, Indiana 47454
Permit Number: F117-24008-00026
Plt ID: 117-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.94E-05	1.68E-05	1.05E-03	2.52E-02	4.77E-05

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.01E-06	1.54E-05	1.96E-05	5.33E-06	2.94E-05
Total HAPs =				2.65E-02	tons/year

Methodology is the same as previous page

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

**Space Heaters Rated at 1.3 MMBtu/hr, 1.3 MMBtu/hr, and 8.0 MMBtu/hr
Company Name: Jasper Seating Co., Inc., Plt. #4
Address City IN Zip: 1352 West Hospital Road, Paoli, Indiana 47454
Permit Number: F117-24008-00026**

**Reviewer: Anne-Marie C. Hart
Date: 10/1/2007**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.6	92.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.35	0.35	0.03	4.64	0.26	3.90

*PM emission factor is total PM. 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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Two Space Heaters at 1.3 MMBtu/hr Each
HAPs Emissions**

Company Name: Jasper Seating Co., Inc., Plt. #4
Address City IN Zip: 1352 West Hospital Road, Paoli, Indiana 47454
Permit Number: F117-24008-00026
Plt ID: 117-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.75E-05	5.57E-05	3.48E-03	8.36E-02	1.58E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.32E-05	5.11E-05	6.50E-05	1.76E-05	9.75E-05
Total HAPs =				8.76E-02	tons/year

Methodology is the same as previous page

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

Appendix A: Emission Calculations
VOC, PM and HAP Emissions from Shipping Adhesive
Company Name: Jasper Seating Co., Inc., Plt #4
Address City IN Zip: 1352 W. Hospital Road, Paoli, Indiana 47454
Permit #: F117-24008-00026
Reviewer: Anne-Marie C. Hart
Date: October 1, 2007

Maximum Application Rate: 0.375 lb/hr
VOC Content: 75% by weight
HAP Content: 1% by weight (Hexane)
Transfer Efficiency: 75% (assumed)

Potential Emissions:

VOC			HAP (Hexane)			PM		
lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year
0.281	6.750	1.232	0.004	0.090	0.016	0.023	0.563	0.103

Methodology

PTE VOC (lb/hr) = Maximum Application Rate (lb/hr) x Weight % VOC

PTE VOC (lb/day) = PTE VOC (lb/hr) x 24 (hr/day)

PTE VOC (ton/year) = PTE VOC (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)