



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 30, 2008

RE: OFS Brands, Inc. - Plant #2 / 037-24184-00025

FROM: Matthew Stuckey, 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

OFS Brands, Inc. - Plant #2 419 North Washington Huntingburg, Indiana 47542

(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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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.: F037-24184-00025	
Issued by: <i>Original document signed by</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 30, 2008 Expiration Date: May 30, 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.4 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 office furniture manufacturing operation.

Source Address:	419 North Washington, Huntingburg, Indiana 47542
Mailing Address:	P.O. Box 100, Huntingburg, IN 47542-0100
General Source Phone Number:	812-683-7165
SIC Code:	2521
County Location:	Dubois
Source Location Status:	Nonattainment for Particulate Matter (PM 2.5) Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 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) Five (5) wood furniture coating booths:
- (1) One (1) wood furniture stain coating (including Sap stain) booth, identified as B-1, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1976, and exhausting to four (4) stacks (S-1A, B, C and D).
 - (2) One (1) wood furniture wash coating booth, identified as B-3, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1976, and exhausting to a stack (S-2).
 - (3) One (1) wood furniture sealer coating booth, identified as B-4, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, and exhausting to a stack (S-4).
 - (4) One (1) wood furniture shade coating booth, identified as B-7, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, and exhausting to two (2) stacks (S-7A and S-7B).
 - (5) One (1) wood furniture last lacquer coating and downdraft spray booth, identified as B-8, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, and exhausting to stack (S-8).

- (b) One (1) woodworking operation, installed in or prior to 1976, rated at 1,515 pounds raw materials per hour, including three (3) edge sanders, one (1) 36-inch bands, one (1) boring machine, one (1) multi-drill, one (1) single spindle shape, one (1) horizontal drill, three (3) routers, one (1) tenon machine, one (1) dovetail machine, one (1) automatic sharpener, one (1) mould sander, one (1) belt polisher, one (1) uni-point saw, one (1) sander, and two (2) mortisers, all controlled by one (1) baghouse identified as the Carter-Day Dust Collection System.

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, as defined in 326 IAC 2-7-1(21).

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, consisting of the following indirect heating units:
 - (1) three (3) natural gas-fired air make-up unit, rated at 2 MMBtu/hr; 2.3 MMBtu/hr and 4 MMBtu/hr;
 - (2) one (1) 6.7 MMBtu/hr natural gas-fired boiler , identified as B-7, with a maximum capacity of 200hp (6.7 MMBtu/hr) and exhausting to stack 14 [326 IAC 6-3-2]
- and the following direct heat units:
- (1) four (4) natural gas-fired drying ovens, rated at 1 MMBtu/hr each
 - (b) one (1) steam air make-up unit;
 - (c) one (1) 75 HP air compressor; and
 - (d) one (1) 15 HP air compressor.

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, F037-24184-00025, 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, and Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Facsimile Number: 317-233-6865

Southwest Regional Office phone: (812) 380-2305; 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 F037-24184-00025 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 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 two hundred fifty (250) 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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Stack Height [326 IAC 1-7]

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 Licensed 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 Licensed 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 and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.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 [326 IAC 2-8-4(10)]:

- (a) Five (5) wood furniture coating booths:
- (1) One (1) wood furniture stain coating (including Sap stain) booth identified as B-1, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1976, and exhausting to stacks (S-1A, B, C and D).
 - (2) One (1) wood furniture wash coating booth identified as B-3, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1976, exhausting to stack (S-2).
 - (3) One (1) wood furniture sealer coating booth identified as B-4, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, exhausting to stack (S-4).
 - (4) One (1) wood furniture shade coating booth identified as B-7, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, exhausting to stacks (S-7A and S7B).
 - (5) One (1) wood furniture last lacquer coating and downdraft spray booth identified as B-8, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, exhausting to stack (S-8).

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

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

D.1.1 Hazardous Air Pollutants [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the Permittee shall comply with the following:

- (a) The input of any single HAP to coating booths B-1, B-3, B-4, B-7 and B-8, shall be less than 9.9 tons per 12 consecutive month period with compliance determined at the end of each month
- (b) The input of any combination of HAPs at coating booths B-1, B-3, B-4, B-7 and B-8, shall be less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations in conjunctions with HAP emission limits for other emission units at this source renders 326 IAC 2-7 not applicable.

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

Pursuant to 326 IAC 2-8, the VOC input, including coatings, dilution solvents and cleaning solvents, at coating booths B-1, B-3, B-4, B-7 and B-8, shall be less than 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and renders 326 IAC 2-7 not applicable.

D.1.3 Particulate Emission Limitations (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6-1-2(a) PM emissions from coating booths B-1, B-3, B-4, B-7 and B-8 shall be limited to less than 0.03 grains per dry standard cubic foot of air.

D.1.4 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 in booths B-4, B-7 and B-8 to wood furniture 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.1.5 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 these facilities and control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and HAPs [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAPs content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAPs 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.

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

D.1.7 Particulate Control

In order to comply with D.1.3 and D.1.4, the dry filters for PM control shall be in operation at all times when the five (5) coating booths (B-1, B-3, B-4, B-7 and B-8) are in operation.

D.1.8 Monitoring

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth B-1, B-3, B-4, B-7 and B-8, stacks (S-1A, B,C and D, S-2, S-4, S-7A, S-7B, and S-8) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the

Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D. 1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below and shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAP's emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

- (b) One (1) woodworking operation, rated at 1,515 pounds raw materials per hour, including three (3) edge sanders, one (1) 36-inch bands, one (1) boring machine, one (1) multi-drill, one (1) single spindle shape, one (1) horizontal drill, three (3) routers, one (1) tenon machine, one (1) dovetail machine, one (1) automatic sharpener, one (1) mould sander, one (1) belt polisher, one (1) uni-point saw, one (1) sander, and two (2) mortisers, all controlled by one (1) baghouse identified as the Carter-Day Dust Collection System with a 99.9% efficiency, installed in or prior to 1976.

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

Pursuant to 326 IAC 6.5-1-2(a), the PM emissions from the woodworking operations shall not exceed 0.03 grains per dry standard cubic foot of outlet air, equivalent to 3.40 pounds per hour when operating at a process weight rate of 1,515 pounds per hour.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.2.1 and D.2.2, the Carter-Day Dust Collection System (i.e., baghouse) for PM control shall be in operation and control emissions from the woodworking operation at all times that the woodworking equipment is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the Carter-Day Dust Collection System stack exhaust shall be performed 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.

D.2.5 Broken or Failed Bag Detection

- (a) For single compartment baghouses, controlling emissions from a process operated continuously, a failed unit and 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 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 emission unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations of the Carter-Day Dust Collection System stack exhaust. The Permittee shall include in its daily record when a visible emission 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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, consisting of the following indirect heating units:
- (1) three (3) natural gas-fired air make-up unit, rated at 2 MMBtu/hr; 2.3 MMBtu/hr and 4 MMBtu/hr;
 - (2) one (1) 6.7 MMBtu/hr natural gas-fired boiler, identified as B-7, with a maximum capacity of 200hp (6.7 MMBtu/hr) and exhausting to stack 14 [326 IAC 6-3-2]

(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 Matter Limitations [326 IAC 6.5-1-2(b)(3)]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from the natural gas air make up unit and the boiler (B-7) shall be limited to less than one hundredth (0.01) grain per dry standard cubic foot.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL CERTIFICATION

Source Name: OFS Brands, Inc. - Plant #2
Source Address: 419 North Washington, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, IN 47542-0100
FESOP Permit No.: F037-24184-00025

**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) RENEWAL
EMERGENCY OCCURRENCE REPORT**

Source Name: OFS Brands, Inc. - Plant #2
Source Address: 419 North Washington, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, IN 47542-0100
FESOP Permit No.: F037-24184-00025

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: OFS Brands, Inc. - Plant #2
 Source Address: 419 North Washington, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, IN 47542-0100
 FESOP Permit No.: F037-24184-00025
 Facilities: Coating Booths B-1 through B-8
 Parameter: Total VOC and Single and Combined Hazardous Air Pollutants (HAPs)
 Limits: (a) The total input usage of volatile organic compounds (VOC) at coating booths B-1, B-3, B-4, B-7 and B-8, including VOC solvent and diluent usage, shall be less than 98.8 tons per twelve (12) consecutive month period.
 (b) The total input usage of any single hazardous air pollutant (HAP) at coating booths B-1, B-3, B-4, B-7 and B-8, including solvent and diluent usage, shall be less than 9.9 tons per twelve (12) consecutive month period.
 (c) The total input usage of the combined HAPs at coating booths B-1, B-3, B-4, B-7 and B-8, including solvent and diluent usage, shall be less than 24.9 tons per twelve (12) consecutive month period.

YEAR: _____

Month (a)	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total
Month (b)	Worst HAP This Month	Worst HAP Previous 11 Months	Worst HAP 12 Month Total
Month (c)	Combination/HAPS This Month	Combination/HAPS Previous 11 Months	Combination/HAPS 12 Month Total

- 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) RENEWAL
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: OFS Brands, Inc. - Plant #2
 Source Address: 419 North Washington, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, IN 47542-0100
 FESOP Permit No.: F037-24184-00025

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

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

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

Source Background and Description

Source Name: OFS Brands, Inc. - Plant #2
Source Location: 419 North Washington Street, Huntingburg, Indiana 47542
County: Dubois
SIC Code: 2521
Permit Renewal No.: F037-24184-00025
Permit Reviewer: Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from OFS Brands, Inc. - Plant #2 for the operation of a stationary wood office furniture manufacturing operation.

History

On January 8, 2007, IDEM received an application from OFS Brands, Inc., formerly Styline Industries, Inc. requesting to renew its operating permit. Styline Industries, Inc., was issued a FESOP Renewal permit No. F037-13871-00025 on August 20, 2001. A letter was received on January 25, 2007, notifying the OAQ that Styline Industries, Inc., had changed its name to OFS Brands, Inc. - Plant #2 effective as of January 1, 2007.

Permitted Emission Units and Pollution Control Equipment

The operation includes the following emission units and pollution control devices:

- (a) Five (5) wood furniture coating booths:
- (1) One (1) wood furniture stain coating (including Sap stain) booth, identified as B-1, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1976, and exhausting to four (4) stacks (S-1A, B, C and D).
 - (2) One (1) wood furniture wash coating booth, identified as B-3, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1976, and exhausting to a stack (S-2).
 - (3) One (1) wood furniture sealer coating booth, identified as B-4, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, and exhausting to a stack (S-4).
 - (4) One (1) wood furniture shade coating booth, identified as B-7, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, and exhausting to two (2) stacks (S-7A and S-7B).

- (5) One (1) wood furniture last lacquer coating and downdraft spray booth, identified as B-8, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter as control, installed in 1986, and exhausting to stack (S-8).
- (b) One (1) woodworking operation, rated at 1,515 pounds raw materials per hour, including three (3) edge sanders, one (1) 36-inch bands, one (1) boring machine, one (1) multi-drill, one (1) single spindle shape, one (1) horizontal drill, three (3) routers, one (1) tenon machine, one (1) dovetail machine, one (1) automatic sharpener, one (1) mould sander, one (1) belt polisher, one (1) uni-point saw, one (1) sander, and two (2) mortisers, all controlled by one (1) baghouse identified as the Carter-Day Dust Collection System, installed in or prior to 1976.

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

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

Emission Units and Pollution Control Equipment Removed From the Source

The source had also consisted of the following permitted emission units and pollution control devices that were removed from service since the last renewal, prior to this review process:

- (a) One (1) wood furniture wipe stain and filler booth, identified as B-3, installed in 1976, rated at 7.5 units per hour, utilizing a roll coating and brushing application system, exhausting at one (1) stack identified as S-3;
- (b) One (1) wood furniture coating booth, identified as B-5, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as S-5;
- (c) One (1) wood furniture lacquer coating booth, identified as B-6, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as S-6;
- (d) One (1) bituminous coal fired boiler with underfeed stoker and overfire air, installed in 1975, rated at 5.03 million British thermal units per hour (MMBtu/hr), exhausting at one (1) stack identified as boiler stack, was removed from the source in Administrative Amendment F037-19858-00025, issued June 4, 2004.

The source also consisted of the following insignificant activities, as defined in 326 IAC 2-7-1(21) that were removed from the source during this review process:

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (b) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPS;
- (c) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling

tower;

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, consisting of the following indirect heating units:
 - (1) three (3) natural gas-fired air make-up unit, rated at 2 MMBtu/hr; 2.3 MMBtu/hr and 4 MMBtu/hr;
 - (2) one (1) 6.7 MMBtu/hr natural gas-fired boiler , identified as B-7, with a maximum capacity of 200hp (6.7 MMBtu/hr) and exhausting to stack 14 [326 IAC 6-3-2]

and the following direct heat units:

- (1) four (4) natural gas-fired drying ovens, rated at 1 MMBtu/hr each
- (b) one (1) steam air make-up unit;
- (c) one (1) 75 HP air compressor; and
- (d) one (1) 15 HP air compressor.

Existing Approvals

Since the issuance of the FESOP renewal F037-13871-00025 issued on August 20, 2001, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. F037-18958-00025, issued on June 4, 2004;
- (b) Administrative Amendment No. F037-21013-00025, issued on May 11 2005; and
- (c) Administrative Amendment No. F037-24355-0025, issued on March 29, 2007.

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

- (a) IDEM is aware that this FESOP renewal application was not submitted before November 20, 2005, which represents the date nine (9) months prior to the expiration date of the original FESOP. 326 IAC 2-8-3(h) requires that in order to be considered timely, a FESOP renewal application must be submitted at least nine (9) months prior to the expiration date of the current operating permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operating permit rules.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 6).

County Attainment Status

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

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) Dubois County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements.
- (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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Dubois County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) 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 the determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) volatile organic compounds (VOC's) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their VOCs 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 the potential to emit (as defined in 326 IAC 2-7-1(29)) the combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their HAPs to less than Title V levels, therefore the source will be issued a FESOP.
- (d) 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.

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 federally 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
Surface Coating	2.7	2.7	0.00	< 98.8	0.00	0.00	Single < 10 Total < 25
Woodworking Operation	14.9**	14.9	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (natural gas combustion)	0.1	0.1	negligible	0.4	0.00	0.0	0.1
Total PTE After Issuance	28.1	18.2	0.00	< 100***	0.00	0.00	Single < 10 Total < 25
TV Major	-	100	100	100	100	100	Single < 10 Total < 25
PSD Major	250	-	250	250	250	250	Single < 10 Total < 25
Emission Offset	-	100	-	-	-	-	-

- * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM 10), not particulate matter (PM), is considered as a "regulated air pollutant". U.S. EPA has directed states to regulate PM 10 emissions as surrogate for PM 2.5 emissions.
- **The PM value for the woodworking represents the allowable PM emission rate of 0.03 grains per dry standard cubic foot of exhaust air pursuant to 326 IAC 6-5, equivalent to 4.47 pounds of PM per hour, equivalent to 14.9 tons of PM per year.
- *** Although the uncontrolled potential to emit VOCs in excess of 100 tons per year, the source has agreed to limit its VOC emissions to less than one hundred (100) tons per year for the paint booths. This limit in combination with all of the emission units located at the source will overall limit VOC to less than 100 tons per year. The source will limit its emissions by record keeping and reporting.
 - (a) This existing stationary source is not major for PSD because the emissions of each attainment 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) This existing stationary source is not major for Emission Offset because the emissions of nonattainment criteria pollutants are less than 100 tons per year
 - (c) 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

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. This source is operating as a FESOP. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 63) included in this permit renewal.
- (d) The woodworking operation is not subject to the National Emission Standards for Wood Hazardous Air Pollutant, 326 IAC 20, (40 CFR Part 63.800, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations). This source has taken a limit of less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year for any combination of HAPS, therefore the source is not considered a major source of HAPS. Therefore the requirements of 40 CFR, Subpart JJ are not included in this permit.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on May 3, 2001. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The potential to emit is greater than 100 tons of VOCs and the source agreed to limit VOCs to less than 100 tons per year. Therefore, the requirements do not apply to this source.

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

The source constructed prior to the PSD applicability date of August 7, 1977, and is still a minor existing PSD source because it has the potential to emit less than 250 tons per year of any criteria pollutant. This source is not one of the twenty-eight (28) listed source categories. Although the uncontrolled potential to emit VOCs in excess of 100 tons per year, the source has agreed to limit its VOC emissions to less than one hundred (100) tons per year. Therefore, 326 IAC 2-2 (PSD) is not applicable.

326 IAC 2-3 (Emission Offset)

This source has opted to continue to operate under 326 IAC 2-8 (FESOP) rules. The source-wide potential VOC emissions will be limited to less than one hundred (100) tons per year as part of this FESOP Renewal. Therefore, this source is considered a minor source under 326 IAC 2-3 (Emission Offset).

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

Dubois County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment regulated pollutant. OFS Brands, Inc. - Plant #2 has a source-wide potential to emit of PM10 below one hundred (100) tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Nonattainment NSR does not apply for PM2.5.

326 IAC 2-4.1-1 (New Source Toxics Control)

The surface coating operation will emit greater than ten (10) tons per year for a single HAP and/or greater than twenty-five (25) tons per year for a combination of HAPs; however, the source has agreed to continue to limit their surface coating operation to less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 is not applicable.

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). No facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) still do not apply to this source.

326 IAC 2-8-4 (FESOP)

- (a) Pursuant to this rule, the amount of VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply. The source will be issued a FESOP.

- (b) Any change or modification which may increase potential to emit PM₁₀, SO₂, CO and/or NO_x from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

Additionally, the source shall comply as follows:

- (a) The total input usage of volatile organic compounds (VOC) at coating booths B-1, B-3, B-4, B-7 and B-8 combined, including VOC solvent and diluents, shall be less than 98.8 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period.
- (b) The total input usage of any single hazardous air pollutant (HAP) at coating booths B-1, B-3, B-4, B-7 and B-8, including solvent and diluent usage, shall be less than 9.9 tons per 12 consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.
- (c) The total input usage of the combined HAPs at coating booths B-1, B-3, B-4, B-7 and B-8, including solvent and diluent usage, shall be less than 24.9 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 10 tons per 12 consecutive month period.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

This source is located in Dubois County, but not in Bainbridge Township where alternate opacity limits apply. Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

326 IAC 6-4 (Fugitive 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).

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

This source is located in one of the counties listed in 326 IAC 6-5-1(a), (it is in Dubois County, but not in Bainbridge Township). Pursuant to 326 IAC 6-5-1(b), the spray booths (B-4, B-7 and B-8) were constructed after December 13, 1985; however, fugitive particulate emissions are expected to be minimal for the entire source. Therefore, the source is not subject to 326 IAC 6-5.

326 IAC 8-1-6 (Volatile Organic Compounds: New Facilities: BACT)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

This source is regulated by 326 IAC 8-2-12 for coating booths B-4, B-7 and B-8. As a FESOP source, coating booths B-1 and B-3, installed in 1976, do not have potential solvent VOC emissions at, or in excess of 100 tons per year. Therefore, the requirements of this rule do not apply.

326 IAC 8-4 (Petroleum Sources)

This source is located in Dubois County, was constructed prior to January 1, 1980, and is not one of the types of operations regulated by 326 IAC 8-4. Therefore, the requirements of 326 IAC 8-4 do not apply to any of the facilities at this source.

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

This source is located in Dubois County. Therefore, the requirements of 326 IAC 10-1 do not apply to any of the facilities at this source.

State Rule Applicability - Individual Facilities

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is regulated by 326 IAC 8-2-12 for coating booths B-4, B-7 and B-8. As a FESOP source, coating booths B-1 and B-3, installed in 1976, do not have potential solvent VOC emissions at, or in excess of 100 tons per year. Therefore, the requirements of this rule do not apply.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

This source is located in Dubois County. Therefore, the requirements of 326 IAC 8-7 do not apply to any of the facilities at this source.

326 IAC 6.5-1 (Nonattainment Area Particulate Limitations)

The source is located in Dubois County, but is not listed in 326 IAC 6.5-1-9. The source does not have the potential to emit one hundred (100) tons or more of particulate matter per year or actual emissions of ten (10) tons or more of particulate matter per year. Pursuant to 326 IAC 6.5-1-1, the requirements of 326 IAC 6.5-1 do not apply to this source.

The PTE of PM for the source is less than 100 tpy. As controlled facilities operating less than 2,000 hours per year, neither the coating booths nor the woodworking operation have actual PM emissions of 10 tpy. Total actual PM emitted from natural gas combustion, surface coating and woodworking, conservatively based on a full year of 8,760 hours of operation, is only 0.4 tpy (see page 1 of 6, TSD Appendix A). When combined with the other facilities, the source-wide actual PM emission rate of 2.5 tpy is less than the rule applicability threshold of 10 tpy actual PM. Therefore, the requirements of 326 IAC 6.5-1 do not apply.

State Rule Applicability - Individual Facilities

326 IAC 8-2-12 (Wood furniture and cabinet coating)

The surface coating operations are subject to the requirements of 326 IAC 8-2-12 since the coatings are being applied to solid wood or wood composition. The existing HVLP spray applicators used in the painting operation comply with this rule.

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.

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 (Wood furniture and cabinet coating), facilities constructed in a listed county before November 1, 1980, which are located at a source with potential emissions of 100 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall comply with the applicable requirements of 326 IAC 8-2-12. Facilities constructed in any county after January 1, 1980, and which have potential emissions of 25 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall likewise comply with the applicable requirements of 326 IAC 8-2-12.

Wood furniture coating booths B-4, B-7 and B-8 are subject to the provisions of 326 IAC 8-2-12. The source continues to comply with 326 IAC 8-2-12 by using air assisted airless, high volume low pressure (HVLP), roller coating and brush/wipe application methods in booths B4, B7 and B-8, as approved methods of application pursuant to 326 IAC 8-2-12.

Wood furniture coating booths B-1 and B-3 were installed in 1976; however, the source is located in Dubois County which is not a listed county and the requirements of 326 IAC 8-2-12 do not apply to these facilities. While not required by rule to do so, coating booths B-1 and B-3 utilize coating application systems consistent with the requirements of 326 IAC 8-2-12.

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

Pursuant to 326 IAC 6-2-1, indirect heating facilities not in a specified county and existing and operating prior to September 21, 1983, shall limit particulate matter (PM) emissions according to the equation at 326 IAC 6-2-3. These requirements do not apply to the source since the coal fired boiler has been removed.

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

Pursuant to 326 IAC 6-3-2(c), particulate matter emissions shall be limited as follows:

- (a) Particulate from coating booths B-1, B-3, B-4, B-7 and B-8 shall be controlled by a dry particulate filter control system, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) The allowable PM emission rate from the woodworking operation shall not exceed 3.40 pounds per hour when operating at a process weight rate of 1,515 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

Compliance with this limit is shown through calculation on page 5 of 6, TSD Appendix A. The Carter-Day Dust Collection System (i.e., baghouse) shall be in operation at all times the woodworking equipment is in operation in order to comply with this limit.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule requires all facilities with a potential to emit (PTE) at or greater than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO₂) to comply with the emission limitations and test compliance methods stated in the rule. These requirements do not apply to the source since the coal fired boiler has been removed.

326 IAC 7-1 (Sulfur Dioxide Compliance Requirements)

These requirements do not apply to the source since the coal fired boiler has been removed.

State Rule Applicability - Insignificant Activities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate emissions from the natural gas-fired boiler (B-7) shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

Pursuant to 326 IAC 6-2-1(e), if any limitation established by 326 IAC 6-2 is less stringent than the applicable limitations contained in 326 IAC 6.5 and 326 IAC 6.8, then the limitations contained in 326 IAC 6.5 and 326 IAC 6.8 prevail. Therefore, the natural gas-fired boiler is not subject to 326 IAC 6-2-4 because they are subject to the more stringent limit in 326 IAC 6.5-1-2(b)(3).

Testing Requirements

Compliance testing is not required of this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the woodworking operations are controlled by a baghouse with emissions after control well below the allowable particulate matter emission rate.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a 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 conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The five (5) wood furniture coating booths identified as B-1, B-3, B-4, B-7 and B-8 have applicable compliance monitoring conditions as specified below:

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths B-1, B-3, B-4, B-7 and B-8 stacks (S-1A, B, C and D, S-2, S-4, S-7A, S-7B and S-8) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation of this permit.

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 emission, or when evidence of overspray emission is observed, the Permittee shall take reasonable 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 baghouse and dry filters must operate properly to ensure compliance with 326 IAC 2-8-4.

2. The woodworking operation has applicable compliance monitoring conditions as specified below:

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

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

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

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

These monitoring conditions are necessary because the source must operate properly to ensure compliance with the SO₂, VOC, and single and combined HAP emissions limits such that the source is limited to less than Title V applicability levels. Additionally, the stated facilities and their control devices must operate properly to ensure compliance with 326 IAC 5 (Opacity Limitations), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 8-2-12 (VOC Emission Limitations for Wood furniture and cabinet coating), and 326 IAC 2-8-4 (FESOP).

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 January 8, 2007. Additional information was received on July 23, 2007 and October 18, 2007, February 14 and 18, 2008.

Conclusion

The operation of this wood office furniture manufacturing operation shall be subject to the conditions of the attached FESOP Renewal No. F037-24184-00025.

Appendix A: Emission Summary

Company Name: OFS Brands, Inc. - Plant #2
Address City IN Zip: 419 North Washington, Huntingburg, IN 47542
Permit No: F037-24184-00025
Reviewer: Janet Mobley
Date: April 3, 2008

Uncontrolled Emissions

Emission Units	PM	PM ₁₀	SO ₂	VOC	CO	NOx	HAPs
Surface Coating Booths (Units B-1, B-3, B-4, B-7 and B-8)	2.7	2.7	0	330.1	0	0	Single 38.5 Total 102.3
Woodworking Operation	45.80	45.80	0	0	0	0	
Natural Gas Combustion Units - Drying ovens, makeup units, B-7	0.1	0.6	0	0.4	6.6	7.9	Single 0.1 Total 0.1
Total	48.51	48.51	0	330.5	6.6	7.9	Single >10 Total >25

Controlled Emissions

Emission Units	PM	PM ₁₀	SO ₂	VOC	CO	NOx	HAPs
Surface Coating Booths (Units B-1, B-3, B-4, B-7 and B-8)	0.2	0.2	0	<98.8	0	0	Single <9.9 Total <24.9
Woodworking Operation	0.10	0.10	0	0	0	0	
Natural Gas Combustion Units - Drying ovens, makeup units, B-7	0.10	0.60	0	0.4	0	0	Single 0.1 Total 0.1
Total	0.4	0.9	0	<100	0	0	Single <10 Total <25

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: OFS Brands, Inc.- Plant #2
Address City IN Zip: 419 North Washington Street, Huntingburg, IN 47542
FESOP Renewal No.: F037-24184-00025
Reviewer: Janet Mobley
Date: April 3, 2008

Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
18.0	157.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.6	0.0	7.9	0.4	0.0

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

Methodology

Total heat input includes three drying ovens @ 1MMBtu/hr each, three air make-up units @ 2MMBtu/hr, 2.3 MMBtu/hr and 4 MMBtu/hr. and one 6.7 MMBtu/hr natural gas boiler

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 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 (SUPPL.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
 MM BTU/HR <100
 HAPs Emissions**

Company Name: OFS Brands, Inc. - Plant #2
Address City IN Zip: 419 North Washington Street, Huntingburg, IN 47542
FESOP Renewal No.: F037-24184-00025
Reviewer: Janet Mobley
Date: April 3, 2008

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	1.039E-04	5.939E-05	3.712E-03	8.909E-02	1.683E-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	2.475E-05	5.444E-05	6.929E-05	1.881E-05	1.039E-04

Methodology is the same as page 2 of 6 of TSD, Appendix A.

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 and Particulate
From Surface Coating Operations**

Company Name: OFS Brands, Inc. - Plant #2
Address City IN Zip: 419 North Washington Street, Huntingburg, IN 47542
FESOP Renewal No.: F037-24184-00025
Reviewer: Janet Mobley
Date: April 3, 2008

Potential Emissions (uncontrolled):																		
Material (as applied)	Process ID	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr (PM)	lb VOC /gal solids	Transfer Efficiency	
NGR Stain (#34, NGR)	Booth B-1	6.69	98.80%	0.00%	98.80%	0.00%	0.70%	0.048552	7.50	6.61	6.61	2.41	57.76	10.54	0.00	944.25	75%	
SAP Stain (#72 Body SAP)	Booth B-1	6.64	99.50%	0.00%	99.50%	0.00%	0.30%	0.068143	7.50	6.61	6.61	3.38	81.04	14.79	0.00	2202.27	75%	
Toner Stain (Light Oak)	Booth B-1	6.61	907.50%	0.00%	97.50%	0.00%	1.30%	0.038712	7.50	6.64	6.64	1.83	43.88	8.01	0.01	510.75	75%	
Wash-out (Vinyl Washcoat)	Booth B-3	7.07	87.60%	0.00%	87.60%	0.00%	8.20%	0.082453	7.50	6.19	6.19	3.83	91.92	16.78	0.08	75.53	75%	
Sealer (Vinyl Sealer)	Booth B-4	7.26	80.00%	0.00%	80.00%	0.00%	13.70%	0.096763	7.50	5.81	5.81	4.21	101.16	18.46	0.15	42.39	75%	
Shade (#70)	Booth B-7	7.05	89.10%	0.00%	89.10%	0.00%	7.20%	0.008177	7.50	6.28	6.28	0.39	9.25	1.69	0.01	87.24	75%	
Last Lacquer	Booth B-8	6.81	97.50%	0.00%	97.50%	0.00%	1.30%	0.036712	7.50	6.64	6.64	1.83	43.88	8.01	0.01	510.75	75%	
VOC Solvents	All Booths	7.31	100.00%	0.00%	100.0%	0.00%	0.00%	2425	gal / year	7.31	7.31	2.02	48.57	8.86	0.00	0.00	75%	
Total Uncontrolled Potential to Emit (tons per year):											15.86	380.32	69.60	0.26				
Total Limited/Controlled Potential to Emit (tons per year):											1.42%	94.00%	15.86	380.32	<98.8	0.02		

Methodology:

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

Notes:

- Total coating material input usage at booths 1 through 8, including VOC solvents and diluents, shall be limited such that the potential to emit (PTE) VOC is less than 98.8 tons per twelve (12) consecutive month period. This usage limit is required to limit the source-wide PTE VOC to less than 100 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.
- The source uses several solvents. Actual general solvent usage was stated by the applicant to be 443 gallons over an approximate 1600 hour period. Worst case VOC emissions were estimated by assuming the solvent with the greatest density and 100% organic content (butyl acetate). Actual usage was then adjusted to potential usage through the ratio of 8760 hours/1600 hours.

**Appendix A: Hazardous Air Pollutant (HAP)
From Surface Coating Operations**

Company Name: OFS Brands, Inc.- Plant #2
Address City IN Zip: 419 North Washington Street, Huntingburg, IN 47542
FESOP Renewal No.: F037-24184-00025
Reviewer: Janet Mobley
Date: April 3, 2008

Coating or Solvent	Booth ID Number	Amount used per unit (gal/unit)	Production units per hour (units/hr)	Max. Annual Usage (gal/yr)	Coating or Solvent Density (lbs/gal)	Annual Weight of coating or solvent used (lbs/yr)	Methanol	Glycol Ethers	Toluene	Formaldehyde	Xylene	MIBK			Total HAPs (tons/yr)	
							(Weight % (tons/yr))									
N.G.R. Stain (as applied)	B-1	0.048552	7.5	3,190	6.67	21,276	92.0% 9.79	7.0% 0.74	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	10.53	
SAP Stain (as applied)	B-1	0.068143	7.5	4,477	6.64	29,727	95.0% 14.12	5.0% 0.74	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	14.86	
Toner Stain (as applied)	B-1	0.04	7.5	2,412	6.81	16,426	16.00 1.31	0.00 0.00	14.00 1.15	35.00 2.87	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	5.34	
Washcoat (as applied)	B-3	0.082453	7.5	5,417	7.07	38,299	0.0% 0.00	0.0% 0.00	17.0% 3.26	0.2% 0.04	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	3.29	
Sealer (as applied)	B-4	0.096763	7.5	6,357	7.26	46,154	9.0% 2.08	0.0% 0.00	10.0% 2.31	0.2% 0.05	2.0% 0.46	0.0% 0.00	0.0% 0.00	0.0% 0.00	4.89	
Shade (as applied)	B-7	0.008177	7.5	537	7.05	3,787	0.0% 0.00	0.0% 0.00	14.0% 0.27	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.27	
Last Laquer (as applied)	B-8	0.036712	7.5	2,412	6.81	16,426	16.0% 1.31	0.0% 0.00	14.0% 1.15	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	2.46	
Solvents	All Booths	0.036910	7.5	2,425	6.71	16,272	100.0% 8.14	0.0% 0.00	48.1% 3.91	0.0% 0.00	14.2% 1.16	6.0% 0.49	0.0% 0.00	0.0% 0.00	8.14	
Total Uncontrolled Potential to Emit (tons per year):							#REF!	#REF!	#REF!	#REF!	#REF!	#REF!	0.00	0.00	#REF!	
Total Controlled/Limited Potential to Emit (tons per year):							< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 25

Methodology:

Total coating material input usage at booths 1,3,4,7 and 8, including VOC solvents and diluents, shall be limited such that the potential to emit (PTE) single and combined HAPs is less than 10 tons and 25 tons per twelve (12) consecutive month period, respectively.
 Compliance with these limits shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

Uncontrolled Potential HAP Emission Rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs (booths that are listed more than once apply coatings on a mutually exclusive basis and the worst case HAP is reflected in the total.

Limited Potential HAP Emission Rate (tons/yr) = Uncontrolled Potential HAP Emission Rate * Coating Material Input Limit (such that single HAP emissions <10 tpy and total HAP emissions < 25 tpy)

The source uses several solvents. HAP emissions have been computed based on an average density of all solvents and the maximum Weight % (among all solvents) of each HAP.

Appendix A: Process Particulate Matter Emissions

Company Name: OFS Brands, Inc.- Plant #2
Address City IN Zip: 419 North Washington Street, Huntingburg, IN 47542
FESOP Renewal No.: F037-24184-00025
Reviewer: Janet Mobley
Date: April 3, 2008

Potential Uncontrolled Emissions (tons/year)

The following calculations determine emissions from the woodworking operation based on 8,760 hour of production and hourly PM data collected, as supplied by the applicant.

Carter-Day Dust Collection System:

$$\begin{array}{r}
 \text{PM/PM10} \quad \frac{10.45 \text{ pounds collected/hr} \times 8760 \text{ hr/yr}}{99.9\% \text{ control efficiency} \times 2000 \text{ pounds/ton}} = 45.82 \text{ tons / year}
 \end{array}$$

Potential Controlled Emissions (tons/year)

Carter-Day Dust Collection System:

$$\text{PM/PM10} \quad 45.82 \text{ tons/yr} \times 0.1\% \text{ emitted after controls} = 0.05 \text{ tons / year}$$

326 IAC 6-3-2 (c) Compliance Calculations

The following calculation determines compliance with 326 IAC 6-3-2(c) for process weight rates less than 30 tons per hour.

$$E = 4.1 * P^{0.67} =$$

where: E = allowable PM emission rate (lb/hr)
 P = process weight rate (tons/hr)

Plant #2 has a process weight rate of 1,515 pounds per hour (0.7575 tons per hour)

$$E = 4.1 * 0.7575^{0.67} = 3.40 \text{ lb / hr}$$

Carter-Day Dust Collection System:

$$0.05 \text{ tons/yr} / 4.38 \text{ (lb/hr) / (tons/yr)} = 0.01 \text{ lb/hr (will comply)}$$