



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: February 22, 2008
RE: Swiss Plywood Corporation / 123-24291-00007
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



Mitchell E. Daniels, Jr.
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Swiss Plywood Corporation
102 Main Street
Tell City, Indiana 47586**

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

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

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

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

Operation Permit No.: F123-24291-00007	
Issued by: <i>Original signed by</i> Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 22, 2008 Expiration Date: February 22, 2018

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	102 Main Street, Tell City, Indiana 47586
Mailing Address:	102 Main Street, Tell City, IN 47586
General Source Phone Number:	(812) 547-2366
SIC Code:	2434
County Location:	Perry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Twenty-one (21) spray paint booths identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28 (each constructed prior to 1974). Each booth is equipped with conventional air spray guns, HVLP spray guns, and air-assisted airless spray guns for wood furniture coating, and is equipped with dry filters for particulate matter control, and each exhausting through stacks identified as following: S1 and S2 for E1; S3 and S4 for E2; S5 - S7 for E3; S10 and S11 for E5; S12 and S13 for E6; S41 for E7; S17 and S18 for E9; S19 and S20 for E10; S21 and S22 for E11; S24 and S25 for E13; S26 for E14; S28 and S29 for E15; S31 and S32 for E17; S16 for E19; S34 for E20; S33 for E21; S35 for E23; S36 for E24; S37 for E25; S40 for E26; and S39 for E28.
- (b) One (1) woodworking operation, permitted in 1997, identified as E22 with a maximum throughput of 4200 pounds per hour of wood, equipped with two (2) baghouses (identified as E22a & E22b) for particulate matter control and exhausting through stacks S38a and S38b, respectively.

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4]
- (b) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour:

Five (5) natural gas fired heating ovens, identified as E4, E8, E12, E16, and E18, each rated at maximum heat input rate of 2.30 MMBtu per hour [326 IAC 6-2-4].

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, F123-24291-00007, 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 F123-24291-00007 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

and

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

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than 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.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

Emissions Unit Description:

- (a) Twenty-one (21) spray paint booths identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28 (each constructed prior to 1974). Each booth is equipped with conventional air spray guns, HVLP spray guns, and air-assisted airless spray guns for wood furniture coating, and is equipped with dry filters for particulate matter control, and each exhausting through stacks identified as following: S1 and S2 for E1; S3 and S4 for E2; S5 - S7 for E3; S10 and S11 for E5; S12 and S13 for E6; S41 for E7; S17 and S18 for E9; S19 and S20 for E10; S21 and S22 for E11; S24 and S25 for E13; S26 for E14; S28 and S29 for E15; S31 and S32 for E17; S16 for E19; S34 for E20; S33 for E21; S35 for E23; S36 for E24; S37 for E25; S40 for E26; and S39 for E28.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total input usage of volatile organic compounds (VOC) at the twenty one (21) spray paint booths, including VOC usage for clean-up, shall be limited to less than 99.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this usage limit, including the potential to emit for insignificant activities, will limit the source-wide potential to emit of VOC to less than 100 tons per year and render 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total usage of any single hazardous air pollutant (HAP) at the twenty one (21) spray paint booths shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The combined usage of all hazardous air pollutants (HAPs) at the twenty one (21) spray paint booths shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall render 326 IAC 2-7 (Part 70) not applicable to the source.

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturers specifications and control emissions from the twenty-one (21) spray paint booths identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28 at all times when these facilities are in operation.

D.1.4 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 the twenty-one (21) spray paint booths and their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data

sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the respective total volatile organic compound, and single HAP and total HAP usages for the most recent twelve (12) month period.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1 and D.1.2.
 - (1) The VOC and HAP content of each coating material and solvent used;
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The total VOC usage for each month;
 - (4) The total individual and combined HAP usage for each month;
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of daily overspray observations, once per shift and weekly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with 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 - WOODWORKING OPERATIONS

Emissions Unit Description:

- (b) One (1) woodworking operation, permitted in 1997, identified as E22, with a maximum throughput of 4200 pounds per hour of wood, equipped with two (2) baghouses (identified as E22a & E22b) for particulate matter control and exhausting through stacks S38a and S38b, respectively.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed 6.74 pounds per hour when operating at a process weight rate of 4,200 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:

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

D.2.2 PM10 and PM Emission Limitations [326 IAC 2-8-4]

The total PM10 and PM emissions from the woodworking operation shall not exceed 6.74 pounds per hour each.

Compliance with the above limit, combined with the potential to emit PM10 and PM from other emission units at the source, shall limit the PM10 and PM from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable to the source.

D.2.3 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 the woodworking operation and its control devices.

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Condition D.2.1 and D.2.2, the baghouses (E22a and E22b) for PM and PM10 control shall be in operation at all times that the woodworking operation is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking operations control device stack exhausts (S38a and S38b) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

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

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of each woodworking operations stack exhaust once per day. 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) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

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

Source Name: Swiss Plywood Corporation
Source Address: 102 Main Street, Tell City, Indiana 47586
Mailing Address: 102 Main Street, Tell City, IN 47586
FESOP Permit No.: F123-24291-00007

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Swiss Plywood Corporation
Source Address: 102 Main Street, Tell City, Indiana 47586
Mailing Address: 102 Main Street, Tell City, IN 47586
FESOP Permit No.: F123-24291-00007

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: Swiss Plywood Corporation
 Source Address: 102 Main Street, Tell City, Indiana 47586
 Mailing Address: 102 Main Street, Tell City, IN 47586
 FESOP Permit No.: F123-24291-00007
 Facility: Spray paint booths (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28)
 Parameter: VOC
 Limit: The total input usage of VOC delivered to the applicators in each spray paint booth (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28) and during clean-up shall be limited to less than 99.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____ QUARTER: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	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

FESOP Quarterly Report

Source Name: Swiss Plywood Corporation
 Source Address: 102 Main Street, Tell City, Indiana 47586
 Mailing Address: 102 Main Street, Tell City, IN 47586
 FESOP Permit No.: F123-24291-00007
 Facility: Spray paint booths (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28)
 Parameter: Single and Combined Hazardous Air Pollutants (HAPs)
 Limit: The total input usage of any single HAP, and total HAPs delivered to the applicators in the twenty one (21) spray paint booths (identified as (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28)) and during clean-up shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR: _____ QUARTER: _____

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Swiss Plywood Corporation
 Source Address: 102 Main Street, Tell City, Indiana 47586
 Mailing Address: 102 Main Street, Tell City, IN 47586
 FESOP Permit No.: F123-24291-00007

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name: Swiss Plywood Corporation
Source Location: 102 Main Street, Tell City, IN 47586
County: Perry
SIC Code: 2423
FESOP Permit No.: F123-24291-00007
Permit Reviewer: Summer Keown

On January 14, 2007, the Office of Air Quality (OAQ) sent a Public Notice to the Perry County News stating that Swiss Plywood Corporation had applied for a Federally Enforceable State Operating Permit to operate a wood furniture and cabinet manufacturing plant. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit for this operation and provided information on how the public could review the proposed Federally Enforceable State Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Federally Enforceable State Operating Permit should be issued as proposed.

On February 18, 2008, on behalf of the Indiana Department of Environmental Management (IDEM) Southwest Regional Office Compliance Section, Derrick Ohning submitted comments on the proposed Federally Enforceable State Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

The table of contents indicates two (2) D.1 sections.

D.1. EMISSIONS UNIT OPERATION CONDITIONS - SPRAY PAINT BOOTHS..... 23

D.1. EMISSIONS UNIT OPERATION CONDITIONS - WOODWORKING OPERATIONS..... 26

Response 1:

The following changes have been made to the Table of Contents, page 3 of the permit:

D.1. EMISSIONS UNIT OPERATION CONDITIONS - SPRAY PAINT BOOTHS..... 23

~~D.1.~~ **D.2** EMISSIONS UNIT OPERATION CONDITIONS - WOODWORKING OPERATIONS 26

Comment 2:

Condition D.1.3 does not appear to coincide with this source which to my knowledge does not engage in fiberglass chopping, and does not require PM control for the 21 spray booths, as required by previous permits.

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturers specifications and control emissions from the two (2) fiberglass chop booths (S5 and S15), the one (1) fiberglass chop booth (S18), and the one (1) surface coating operation for airless spray application of waterbase coatings to woodskirting of spas at all times when these facilities are in operation.

Response 2:

The following changes have been made to Condition D.1.3, page 23 of the permit:

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturers specifications and control emissions from the ~~two (2) fiberglass chop booths (S5 and S15), the one (1) fiberglass chop booth (S18), and the one (1) surface coating operation for airless spray application of waterbase coatings to woodskirting of spas~~ **twenty-one (21) spray paint booths identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28** at all times when these facilities are in operation.

Comment 3:

The VOC and single/combined HAP's quarterly reporting form as-is does not readily identify which quarter the data represents. I think it would be helpful if next to the year an entry be made for the reported quarter, or leave the month's boxes blank.

Response 3:

The following changes have been made to the FESOP Quarterly Report Forms, pages 31 and 32:

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

FESOP Quarterly Report

Source Name: Swiss Plywood Corporation
 Source Address: 102 Main Street, Tell City, Indiana 47586
 Mailing Address: 102 Main Street, Tell City, IN 47586
 FESOP Permit No.: F123-24291-00007
 Facility: Spray paint booths (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28)
 Parameter: VOC
 Limit: The total input usage of VOC delivered to the applicators in each spray paint booth (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28) and during clean-up shall be limited to less than 99.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____ QUARTER: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Swiss Plywood Corporation
 Source Address: 102 Main Street, Tell City, Indiana 47586
 Mailing Address: 102 Main Street, Tell City, IN 47586
 FESOP Permit No.: F123-24291-00007
 Facility: Spray paint booths (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28)
 Parameter: Single and Combined Hazardous Air Pollutants (HAPs)
 Limit: The total input usage of any single HAP, and total HAPs delivered to the applicators in the twenty one (21) spray paint booths (identified as (E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28)) and during clean-up shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR: _____ QUARTER: _____

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality
And Southwest Regional Office

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

Source Background and Description

Source Name:	Swiss Plywood Corporation
Source Location:	102 Main Street, Tell City, IN 47586
County:	Perry
SIC Code:	2434
Permit Renewal No.:	F123-24291-00007
Permit Reviewer:	Summer Keown

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Swiss Plywood Corp. relating to the operation of a stationary wood furniture and cabinet manufacturing plant.

History

On February 7, 2007, Swiss Plywood Corp. submitted applications to the OAQ requesting to renew its operating permit. Swiss Plywood Corp. was issued a FESOP First Renewal, F123-15136-00007, on February 4, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) Twenty-one (21) spray paint booths identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28 (each constructed prior to 1974). Each booth is equipped with conventional air spray guns, HVLP spray guns, and air-assisted airless spray guns for wood furniture coating, and is equipped with dry filters for particulate matter control, and each exhausting through stacks identified as following: S1 and S2 for E1; S3 and S4 for E2; S5 through S7 for E3; S10 and S11 for E5; S12 and S13 for E6; S41 for E7; S17 and S18 for E9; S19 and S20 for E10; S21 and S22 for E11; S24 and S25 for E13; S26 for E14; S28 and S29 for E15; S31 and S32 for E17; S16 for E19; S34 for E20; S33 for E21; S35 for E23; S36 for E24; S37 for E25; S40 for E26; and S39 for E28.
- (b) One (1) woodworking operation, permitted in 1997, identified as E22 with a maximum throughput of 4200 pounds per hour of wood, equipped with two (2) baghouses (identified as E22a & E22b) for particulate matter control and exhausting through stacks S38a and S38b, respectively.

Insignificant Activities

- (a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (b) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases'
- (c) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa, measured at 38°C, or

- (2) having a vapor pressure equal to or less than 7 kPa, measured at 20°C;
- (d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (g) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process; and
- (h) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour:

Five (5) natural gas fired heating ovens, identified as E4, E8, E12, E16, and E18, each rated at maximum heat input rate of 2.30 MMBtu per hour [326 IAC 6-2-4].

Existing Approvals

This source was issued a First FESOP Renewal No. F123-15136-00007 on February 4, 2003.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Maximum Flow Rate (cfm)	Temperature (°F)
S1	Spray Booth E1	4	24	3830	70
S2	Spray Booth E1	4	24	3830	70
S3	Spray Booth E2	3	24	3830	70
S4	Spray Booth E2	3	24	3830	70
S5	Spray Booth E3	4	24	3830	70
S6	Spray Booth E3	4	24	3830	70
S7	Spray Booth E3	4	24	3830	70
S10	Spray Booth E5	4	24	3830	70
S11	Spray Booth E5	4	24	3830	70
S12	Spray Booth E6	4	24	3830	70
S13	Spray Booth E6	4	24	3830	70
S41	Spray Booth E7	7	12	2000	70
S17	Spray Booth E9	6	24	3830	70
S18	Spray Booth E9	6	24	3830	70
S19	Spray Booth E10	4	24	3830	70
S20	Spray Booth E10	4	24	3830	70
S21	Spray Booth E11	4	24	3830	70

Stack ID	Operation	Height (feet)	Diameter (inches)	Maximum Flow Rate (cfm)	Temperature (°F)
S22	Spray Booth E11	4	24	3830	70
S24	Spray Booth E13	4	24	3830	70
S25	Spray Booth E13	4	27	3830	70
S26	Spray Booth E14	4	24	3830	70
S28	Spray Booth E15	4	24	3830	70
S29	Spray Booth E15	4	24	3830	70
S31	Spray Booth E17	4	24	3830	70
S32	Spray Booth E17	4	24	3830	70
S16	Spray Booth E19	2	24	3830	70
S34	Spray Booth E20	3	18	3000	70
S33	Spray Booth E21	3	18	3000	70
S35	Spray Booth E23	3	24	3830	70
S36	Spray Booth E24	3	18	3000	70
S37	Spray Booth E25	3	24	3830	70
S40	Spray Booth E26	3	12	2000	70
S39	Spray Booth E28	3	12	2000	70
S38a	Baghouse E22a	3	18	62000	70
S38b	Baghouse E22b	3	18	62000	70

Emission Calculations

See Appendix A, pages 1 through 6, of this document for detailed emission calculations.

County Attainment Status

The source is located in Perry County

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Perry County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Perry County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (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 determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	538.51
PM-10	538.79
SO ₂	0.03
VOC	282.56
CO	4.23
NO _x	5.04

HAPs	tons/year
Xylene	146.21
Toluene	242.16
MIK	43.79
Glycol Ethers	41.62
Ethylbenzene	30.74
Formaldehyde	0.93
Total	242.26*

*Assuming highest possible HAPs emissions

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

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

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

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

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Surface Coating	9.26	9.26	0.00	<99.07	0.00	0.00	<9.90 for single <24.90 total
Woodworking	4.50	4.50	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	0.10	0.38	0.03	0.28	4.23	5.04	0.10 total
Total Emissions	13.86	14.14	0.03	<100	4.23	5.04	<10 for single HAP <25 total

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

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal. The source shall limit coating material usage such that single and combined HAP emissions are limited to less than 10 tons per year and 25 tons per year, respectively, making this a minor source of HAPs pursuant to 40 CFR 63.2.

State Rule Applicability - Entire Source

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

The existing source was constructed prior to the August 7, 1980 rule applicability date. This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. As a FESOP source, the total input usage of VOC shall be limited to less than 100 tons per year, and the control technology and related compliance requirements for particulates shall limit the potential to emit of PM₁₀ (and PM) to less than 100 tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) are not applicable.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:

- (a) The total input usage of VOC delivered to the applicators in the twenty one (21) spray paint booths (identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28) and during clean-up shall be limited to less than 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total input usage of any single HAP, and total HAPs delivered to the applicators in the twenty one (21) spray paint booths (identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28) and during clean-up shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.
- (c) The total PM₁₀ emitted from the woodworking operation and the spray paint booths shall be controlled at less than 100 tons per year by complying with the applicable control technology, work practices, monitoring and record keeping requirements.

Compliance with above conditions will limit the source-wide VOC emissions to less than 100 tons per year and single and total HAP emissions to less than 10 and 25 tons per year, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or

easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability – Individual Facilities

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

The operation of the surface coating and woodworking facilities will limit HAPs emissions to less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

- (a) Particulate from the surface coating facilities, identified as spray paint booths E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26 and E28, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) The particulate from the woodworking operation, identified as E22, equipped with two (2) baghouses (identified as E22a & E22b), shall be limited by the following:

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

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

$$E = 4.10 * (2.1)^{0.67} = 6.74 \text{ lbs PM/hour}$$

Based on the above equation, particulate emissions from the woodworking operation shall be limited to 6.74 pounds per hour. The baghouses E22a and E22b shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

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 are not otherwise regulated by other provisions of Article 8. All coating facilities for Swiss Plywood Corp. were constructed in 1974. Therefore, rule 326 IAC 8-1-6 does not apply to the coating facilities of Swiss Plywood Corp.

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

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 existing in specifically listed counties as of July 1, 1990, or that are newly constructed in any county after July 1, 1990, with actual emissions of greater than 15 pounds of VOC per day before add-on controls, shall likewise comply with the applicable requirements of 326 IAC 8-2-12. The coating facilities for Swiss Plywood Corporation, constructed prior to 1974, are not subject to this rule since these facilities are located in Perry County, which is a non-listed county, and have a limited potential to emit of VOC of less than 100 tons per year. Therefore, the requirements of this rule do not apply to these facilities.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to sources commencing operation after October 7, 1974 and prior to January 1, 1980

that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. The source commenced operation before October 7, 1974 and the potential emissions of VOC are less than 100 tons per year. Therefore, 326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable to this source.

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

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Perry County. Therefore, 326 IAC 8-7 is not applicable to this source.

326 IAC 8-11 (Wood Furniture Coatings)

This rule applies to any person performing wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd County, with the wood furniture manufacturing operations having potential emissions of VOC of 25 tons or more per year and occurring at a source classified with a listed Standard Industrial Classification (SIC) code. This rule is not applicable to this source since it is located in Perry County.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 woodworking operation has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the woodworking operation baghouse stack exhausts shall be performed during normal daylight operations. A trained employee will 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. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal

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

- (b) An inspection shall be performed each calendar quarter of the baghouse controlling the woodworking operations. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
 - (1) 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).
 - (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

These monitoring conditions are necessary because the baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

- 2. The twenty-one (21) spray paint booths (E1, E2, E3, E5, D6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28) have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the spray paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and 326 IAC 2-8 (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 February 7, 2007.

Conclusion

The operation of this stationary wood furniture and cabinet manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. 123-24291-00007.

Appendix A: Emission Calculations

Company Name: Swiss Plywood Corp.
 Source Location: 102 Main Street, Tell City, IN 47586
 Permit Number: F123-24291-00007
 Reviewer: Summer Keown
 Date: November 7, 2007

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking	Insignificant Natural Gas Combustion	TOTAL
PM	92.58	445.83	0.10	538.51
PM10	92.58	445.83	0.38	538.79
SO2	0.00	0.00	0.03	0.03
NOx	0.00	0.00	5.04	5.04
VOC	282.28	0.00	0.28	282.56
CO	0.00	0.00	4.23	4.23
total HAPs	242.16	0.00	0.10	242.26
worst case single HAP	242.16	0.00	0.09	

(toluene)

(hexane)

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

Controlled / Limited Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking	Insignificant Natural Gas Combustion	TOTAL
PM	9.26	4.50	0.10	13.86
PM10	9.26	4.50	0.38	14.14
SO2	0.00	0.00	0.03	0.03
NOx	0.00	0.00	5.04	5.04
VOC	<99.0	0.00	0.28	<100
CO	0.00	0.00	4.23	4.23
total HAPs	<9.90 for single HAP <24.90 total HAPs	0.00	0.10	<10 for single HAP <25 total HAPs

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

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

**Company Name: Swiss Plywood Corp.
Address City IN Zip: 102 Main Street, Tell City, IN 47586
Permit Number: F123-24291-00007
Reviewer: Summer Keown
Date: November 7, 2007**

Material	Type Of Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/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)	lb VOC/gal solids	Transfer Efficiency
Booth E3																
SHER-WOOD Wiping Stain, Brown	Wiping Stain	7.15	82.10%	0.30%	81.8%	0.20%	9.40%	1.000	5.86	5.85	5.85	140.37	25.62	3.36	62.22	40%
SHER-WOOD Wiping Stain, Brown	Wiping Stain	8.43	56.80%	0.60%	56.2%	0.70%	26.20%	1.000	4.77	4.74	4.74	113.70	20.75	9.57	18.08	40%
OPEX* M60 Black Lacquer	Lacquer	8.38	59.30%	0.00%	59.3%	0.00%	23.50%	0.375	4.97	4.97	1.86	44.72	8.16	3.36	21.15	40%
HAPs Compliant Lacqr	Lacquer	7.51	77.10%	0.00%	77.1%	0.00%	16.13%	0.375	5.79	5.79	2.17	52.11	9.51	1.69	35.90	40%
													Total PTE for Booth E3:	35.13	12.93	
Booths E1, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28																
OPEX* M60 Black Lacquer	Lacquer	8.38	59.30%	0.00%	59.3%	0.00%	23.50%	0.250	4.97	4.97	1.24	29.82	5.44	2.24	21.15	40%
HAPs Compliant Lacqr	Lacquer	7.51	77.10%	0.00%	77.1%	0.00%	16.13%	0.250	5.79	5.79	1.45	34.74	6.34	1.13	35.90	40%
WW Precat Sealer	Lacquer-Sealer	7.50	68.28%	0.00%	68.3%	0.00%	17.40%	0.250	5.12	5.12	1.28	30.73	5.61	1.56	29.43	40%
													Total PTE for one booth:	11.95	3.80	
													Total PTE for 18 booths:	215.06	68.47	
Booth E5																
OPEX* M60 Black Lacquer	Lacquer	8.38	59.30%	0.00%	59.3%	0.00%	23.50%	0.250	4.97	4.97	1.24	29.82	5.44	2.24	21.15	40%
HAPs Compliant Lacqr	Lacquer	7.51	77.10%	0.00%	77.1%	0.00%	16.13%	0.250	5.79	5.79	1.45	34.74	6.34	1.13	35.90	40%
WW Precat Sealer	Lacquer-Sealer	7.50	68.28%	0.00%	68.3%	0.00%	17.40%	0.313	5.12	5.12	1.60	38.41	7.01	1.95	29.43	40%
													Total PTE for Booth E5:	13.35	4.19	
Booth E2																
OPEX* M60 Black Lacquer	Lacquer	8.38	59.30%	0.00%	59.3%	0.00%	23.50%	0.250	4.97	4.97	1.24	29.82	5.44	2.24	21.15	40%
HAPs Compliant Lacqr	Lacquer	7.51	77.10%	0.00%	77.1%	0.00%	16.13%	0.250	5.79	5.79	1.45	34.74	6.34	1.13	35.90	40%
5170 Conn Walnut NGR	NGR Stain	6.71	38.53%	5.09%	33.4%	4.09%	0.30%	0.438	2.34	2.24	0.98	23.56	4.30	4.74	747.94	40%
H C Conn Wal NGR	NGR Stain	6.67	99.02%	2.00%	97.0%	2.00%	0.62%	0.438	6.60	6.47	2.83	67.95	12.40	0.08	1043.75	40%
													Total PTE for Booth E2:	18.74	6.98	

Worst Case Coating used for each booth used to calculate potential emissions.

Total PTE for Surface Coating: 282.28 92.58

METHODOLOGY

After Controls/Limits: <99.7 9.26

- PM Controlled Emissions = Total PM before controls * 1-Control Efficiency of dry filters (90%)
- 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)

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Swiss Plywood Corp.
Address City IN Zip: 102 Main Street, Tell City, IN 47586
Permit Number: F123-24291-00007
Permit Reviewer: Summer Keown
Date: November 7, 2007**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Methyl Isobutyl Ketone	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAPs (ton/yr)
Booth E3																		
SHER-WOOD Wiping Stain, Brown W/S	7.15	0.03	60.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SHER-WOOD Wiping Stain, Brown S64XXN5852-1286	8.43	0.03	60.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OPEX* M60 Black Lacquer	8.38	0.03	60.0	4.00%	9.00%	0.00%	0.60%	0.00%	3.00%	0.00%	2.64	5.95	0.00	0.40	0.00	1.98	0.00	10.97
HAPs Compliant Lacqr	7.51	0.03	60.0	8.56%	0.87%	0.00%	1.79%	1.00%	0.00%	0.00%	5.07	0.52	0.00	1.06	0.59	0.00	0.00	7.23
Totals for Booth E3:											5.07	5.95	0.00	1.06	0.59	1.98	0.00	10.97
Booths E1, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28																		
OPEX* M60 Black Lacquer	8.38	0.03	60.0	4.00%	9.00%	0.00%	0.60%	0.00%	3.00%	0.00%	2.64	5.95	0.00	0.40	0.00	1.98	0.00	10.97
HAPs Compliant Lacqr	7.51	0.03	60.0	8.56%	0.87%	0.00%	1.79%	1.00%	0.00%	0.00%	5.07	0.52	0.00	1.06	0.59	0.00	0.00	7.23
WW Precat Sealer	7.5	0.03	60.0	3.55%	10.44%	0.08%	0.75%	2.80%	0.00%	0.00%	2.10	6.17	0.05	0.44	1.65	0.00	0.00	10.42
Total for one booth:											7.16	12.12	0.05	1.51	2.24	1.98	0.00	10.97
Totals for 18 booths:											128.92	218.15	0.88	27.11	40.36	35.68	0.00	197.41
Booth E5																		
OPEX* M60 Black Lacquer	8.38	0.03	60.0	4.00%	9.00%	0.00%	0.60%	0.00%	3.00%	0.00%	2.64	5.95	0.00	0.40	0.00	1.98	0.00	10.97
HAPs Compliant Lacqr	7.51	0.03	60.0	8.56%	0.87%	0.00%	1.79%	1.00%	0.00%	0.00%	5.07	0.52	0.00	1.06	0.59	0.00	0.00	7.23
Totals for Booth E5:											5.07	5.95	0.00	1.06	0.59	1.98	0.00	10.97
Booth E2																		
OPEX* M60 Black Lacquer	8.38	0.03	60.0	4.00%	9.00%	0.00%	0.60%	0.00%	3.00%	0.00%	2.64	5.95	0.00	0.40	0.00	1.98	0.00	10.97
HAPs Compliant Lacqr	7.51	0.03	60.0	8.56%	0.87%	0.00%	1.79%	1.00%	0.00%	0.00%	5.07	0.52	0.00	1.06	0.59	0.00	0.00	7.23
WW Precat Sealer	7.5	0.03	60.0	3.55%	10.44%	0.08%	0.75%	2.80%	0.00%	0.00%	2.10	6.17	0.05	0.44	1.65	0.00	0.00	10.42
Total for Booth E2:											7.16	12.12	0.05	1.51	2.24	1.98	0.00	10.97

Worst case coatings used for each booth to calculate potential emissions

Totals for all booths: 146.21 242.16 0.93 30.74 43.79 41.62 0.00 242.16

Total State Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Process Particulate Emissions

Company Name: Swiss Plywood Corp.
Address City IN Zip: 102 Main Street, Tell City, IN 47586
Permit Number: F123-24291-00007
Reviewer: Summer Keown
Date: 7-Nov-2007

Controlled Potential Emissions (tons/year)

Baghouse ID	Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Total (lbs/yr)	Total (tons/yr)
E22a	Woodworking Operation	1	0.00100	18.0	3332.0	4503.34	2.25
E22b	Woodworking Operation	1	0.00100	18.0	3332.0	4503.34	2.25

Uncontrolled Potential Emissions (tons/year)

9006.68 **4.50**

Baghouse ID	Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
E22a	Woodworking Operation	1	0.00100	18.0	3332.0	99.0%	222.92
E22b	Woodworking Operation	1	0.00100	18.0	3332.0	99.0%	222.92

Total Emissions Based on Rated Capacity at 8.760 hours/year and source controls

445.83

Methodology

Potential Uncontrolled Emissions:

Emissions (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs

Controlled Emissions:

Emissions (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Only : Insignificant Activities
MM BTU/HR <100
Company Name: Swiss Plywood Corp.
Address City IN Zip: 102 Main Street, Tell City, IN 47586
Permit Number: F123-24291-00007
Reviewer: Summer Keown
Date: November 7, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

11.5

100.7

Five natural gas fired heating units, identified as E4, E8, E12, E16, and E18, each rated at maximum heat input rate of 2.30 MMBtu/hr

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.10	0.38	0.03	5.04	0.28	4.23

*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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Natural Gas Combustion Only : Insignificant Activities

HAPs Emissions

Company Name: Swiss Plywood Corp.

Address City IN Zip: 102 Main Street, Tell City, IN 47586

Permit Number: F123-24291-00007

Reviewer: Summer Keown

Date: November 7, 2007

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.058E-04	6.044E-05	3.778E-03	9.067E-02	1.713E-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	2.519E-05	5.541E-05	7.052E-05	1.914E-05	1.058E-04

Methodology is the same as page 1.

Total HAPs= 0.10

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