



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
MC 61-53 IGCN 1003  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: July 13, 2007

RE: MasterBrand Cabinets, Inc., Plants #2 and #3A / 037-24403-00015

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

### Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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July 13, 2007

Mr. Michael Decker  
MasterBrand Cabinets, Inc. Plants #2 and #3A  
614 West 3<sup>rd</sup> Street  
Ferdinand, Indiana 47532

Re: SPM 037-24403-00015  
Significant Permit Modification to  
Part 70 No.: T 037-5929-00015

Dear Mr. Decker:

MasterBrand Cabinets, Inc. Plants #2 and #3A was issued Part 70 Operating Permit No. T 037-5929-00015 on November 15, 2000 for a wood furniture manufacturing source located at 1 MasterBrand Cabinets Drive, Jasper, Indiana 47546. A letter requesting changes to this permit was received on February 12, 2007. Pursuant to the provisions of 326 IAC 2-7-12 a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding six (6) new surface coating booths and a new natural gas-fired oven to the existing source.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments will be provided upon approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251, at 631-691-3395 ext. 12 or in Indiana at 1-800-451-6027 (ext. 631-691-3395).

Sincerely,

*Original document signed by*

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

MLK/MES  
Attachments

cc: File - Dubois County  
Dubois County Health Department  
Southwest Regional Office  
Air Compliance Section Inspector - Gene A. Kelso  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Bone





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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

MasterBrand Cabinets Plants #2 and #3A  
One MasterBrand Cabinets Drive  
Jasper, Indiana 47546

(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; and 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 condition B, Emergency Provisions.

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

Operation Permit No.: T037-5929-00015	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: November 15, 2000 Expiration Date: November 15, 2005

Minor Source Modification No.: 037-12868-00015, issued December 17, 2000  
First Administrative Amendment No.: 037-12882-00015, issued January 12, 2001  
Second Administrative Amendment No.: 037-16669-00015, issued October 30, 2002  
Third Administrative Amendment No.: 037-20642-00015, issued November 15, 2005

1 <sup>st</sup> Significant Permit Modification No.: 037-24403-00015 Entire Permit Affected	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 13, 2007

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY .....</b>	<b>5</b>
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
A.5	Source Determination	
<b>B</b>	<b>GENERAL CONDITIONS .....</b>	<b>8</b>
B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]	
B.2	Definitions [326 IAC 2-7-1]	
B.3	Permit Term [326 IAC 2-7-5(2)]	
B.4	Enforceability [326 IAC 2-7-7(a)]	
B.5	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.6	Severability [326 IAC 2-7-5(5)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]	
B.9	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]	
B.10	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.11	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]	
B.12	Emergency Provisions [326 IAC 2-7-16]	
B.13	Permit Shield [326 IAC 2-7-15]	
B.14	Multiple Exceedances [326 IAC 2-7-5(1)(E)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	
B.17	Permit Renewal [326 IAC 2-7-4]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs	
B.20	Operational Flexibility [326 IAC 2-7-20]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6(2)]	
B.23	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>19</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Opacity [326 IAC 5-1]	
C.2	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Operation of Equipment [326 IAC 2-7-6(6)]	
C.6	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.7	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.8	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.10 Monitoring Methods [326 IAC 3]

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

- C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]
- C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

**Stratospheric Ozone Protection**

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Surface Coating operations ..... 28**

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.2 VOC PSD Minor Limit [326 IAC 2-2]
- D.1.3 Particulate Rules: Particulate Emissions Limitations [326 IAC 6.5-1-2(a)]
- D.1.4 PM PSD Minor Limitations [326 IAC 2-2]
- D.1.5 PM<sub>2.5</sub> NSR Nonattainment Limitations and Minor PM<sub>10</sub> Limits [326 IAC 2-1.1-5]  
[326 IAC 2-2]
- D.1.6 General Provisions Relating to HAPs [326 IAC 20-14] [40 CFR 63, Subpart A]
- D.1.7 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]
- D.1.8 Work Practice Standards [40 CFR 63.803]
- D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.11 Volatile Organic Compounds (VOC)
- D.1.12 VOC Emissions
- D.1.13 Particulate Matter (PM/PM<sub>10</sub>) Emissions Determination [326 IAC 2-2] [326 IAC 2-1.1-5]

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

- D.1.14 Monitoring

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

- D.1.15 Record Keeping Requirements
- D.1.16 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS – Insignificant Activities ..... 36**

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

- D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]
- D.2.2 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]
- D.2.3 PM PSD Minor Limitations [326 IAC 2-2]
- D.2.4 PM<sub>2.5</sub> NSR Nonattainment Limitations and Minor PM<sub>10</sub> Limits [326 IAC 2-1.1-5]  
[326 IAC 2-2]
- D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.2.6 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxx)(DD)]
- D.2.7 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxx)(FF)]

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

- D.2.8 Visible Emissions Notations
- D.2.9 Broken Bag or Failure Detection

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

- D.2.10 Record Keeping Requirements

**D.3 FACILITY OPERATION CONDITIONS – Insignificant Activities - brazing equipment,  
cutting torches, soldering equipment, welding equipment..... 39**

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

- D.3.1 Particulate Matter Emissions Limitations [326 IAC 6-1-2]

<b>Certification .....</b>	<b>40</b>
<b>Emergency/Deviation Occurrence Report.....</b>	<b>41</b>
<b>Quarterly Reports.....</b>	<b>43</b>
<b>Semi-Annual Compliance Monitoring Report .....</b>	<b>47</b>
<b>Semi-Annual HAP Report.....</b>	<b>48</b>

## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary wood furniture manufacturing operation.

Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546;  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
SIC Code: 2434, 2517  
County Location: Dubois  
County Status: Nonattainment for PM<sub>2.5</sub>  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, under Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

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

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

- (1) Surface coating operations, identified as:
  - (a) Sixteen (16) surface coating operations located in Plant #2:
    - (i) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks S1 and S2 at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
    - (ii) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks ST2 and ST1 at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
    - (iii) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks TC1 and TC2 at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.

- (iv) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack T1 at a maximum flow rate of 11,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
- (v) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack S3 at a maximum flow rate of 9,500 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
- (vi) Two (2) topcoat touch-up booths, constructed in March 1986, identified as TCB9 and TCB12, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour each, and with emissions controlled by dry filters and exhausting to stacks TC4 and TC3 at maximum flow rates of 9,500 and 6,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
- (vii) Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4, using high volume low pressure (HVLP) spray guns with a maximum capacity of 70 wood units per hour, each, and with emissions controlled by dry filters and exhausting to stacks OF-1 through OF-4 at maximum flow rates of 10,000, 10,000, 10,000 and 15,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
- (viii) One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1, using high volume low pressure (HVLP) spray guns with a maximum capacity of 350 wood units per hour, and with emissions controlled by dry filters and exhausting to stack TB-1 at a maximum flow rate of 10,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
- (ix) One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1, using high volume low pressure (HVLP) high volume low pressure (HVLP) spray guns with a maximum capacity of 175 wood units per hour, and with emissions controlled by dry filters and exhausting to stack PS-1 at a maximum flow rate of 8,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.

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

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

- (a) One (1) natural gas-fired oven, approved for construction in 2007, identified as OFO-1, rated at 1.0 million British thermal units per hour, and with emissions exhausting to stack OF-7. [326 IAC 6.5-1-2]

- (b) The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.5-1-2]
- (c) Woodworking operations, identified as:
  - (i) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, with a maximum capacity of 5,950 pounds of wood per hour and equipped with two (2) baghouses for particulate control: one with a maximum capacity of 35,000 dscfm and 0.01 gr/dscf and one with a maximum capacity of 30,000 dscfm and 0.01 gr/dscf, and exhausting to stacks C1 and C2, respectively. [326 IAC 6.5-1-2]
  - (ii) Woodworking operations located at Decora Plant #3A, constructed in 1979, identified as MC2, equipped with a baghouse for particulate control, with a maximum capacity of 10,710 pounds of wood per hour and 12,000 dscfm and 0.01 gr/dscf, and exhausting to stack C3. [326 IAC 6.5-1-2]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Source Determination

This source has been determined to be one source based on contiguous properties, having the same SIC codes and owned by one (1) company. There will be one plant identification number: 037-00015 and one Part 70 Operating Permit number: 037-5929.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

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- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled Permit Shield.

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

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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.3 Permit Term [326 IAC 2-7-5(2)]

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7]

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

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

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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.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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 submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (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 2-7-16.

(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 the 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  
Telephone Number: 812-380-2305 or 888-672-8323 (Southwest Regional Office)  
Facsimile Number: 812-380-2304 (Southwest Regional Office)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency 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

and

Indiana Department of Environmental Management  
Southwest Regional Office  
1120 N. Vincennes Avenue  
P.O. Box 128  
Petersburg, Indiana 47567

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

#### B.13 Permit Shield [326 IAC 2-7-15]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

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

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

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

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the responsible official as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

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

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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

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

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

Any such application should be certified by the responsible official as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

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

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under 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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (A) A brief description of the change within the source;
- (B) The date on which the change will occur;
- (C) Any change in emissions; and
- (D) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

**B.22 Inspection and Entry [326 IAC 2-7-6(2)]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 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 thirty percent (30%) 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.2 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

#### C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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 notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

#### **C.7 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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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 the responsible official as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### **C.10 Monitoring Methods [326 IAC 3]**

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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, or other approved methods as specified in this permit.

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

### **C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 13, 1999.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

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

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).

### **C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;

- (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP=s shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned or is returning to operating within Anormal@ parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

- (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
- (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective 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 corrective 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 documents submitted pursuant to this condition do not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

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

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-3-1(II)) affecting an existing emissions unit other than at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm) (2)(A)(iii); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period.

The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.
- (f) If the Permittee is required to comply with the record keeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C) (ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

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

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

Surface coating operations, identified as:

- (a) Sixteen (16) surface coating operations located in Plant #2:
- (i) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks S1 and S2 at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
  - (ii) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks ST2 and ST1 at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
  - (iii) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks TC1 and TC2 at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
  - (iv) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack T1 at a maximum flow rate of 11,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
  - (v) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack S3 with a maximum flow rate of 9,500 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
  - (vi) Two (2) topcoat touch-up booths, constructed in March 1986, identified as TCB9 and TCB12, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour each, and with emissions controlled by dry filters and exhausting to stacks TC4 and TC3 at maximum flow rates of 9,500 and 6,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
  - (vii) Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4, using high volume low pressure (HVLP) spray guns with a maximum capacity of 70 wood units per hour, each, and with emissions controlled by dry filters and exhausting to stacks OF-1 through OF-4 at maximum flow rates of 10,000, 10,000, 10,000 and 15,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
  - (viii) One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1, using high volume low pressure (HVLP) spray guns with a maximum capacity of 350 wood units per hour, and with emissions controlled by dry filters and exhausting to stack TB-1 at a maximum flow rate of 10,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
  - (ix) One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1, using high volume low pressure (HVLP) high volume low pressure (HVLP) spray guns with a maximum capacity of 175 wood units per hour, and with emissions controlled by dry filters and exhausting to stack PS-1 at a maximum flow rate of 8,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.

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

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

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

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furnishings in the sealer touch-up booth (SB8), and the six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, shall utilize one of the following application methods:

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

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

#### D.1.2 VOC PSD Minor Limit [326 IAC 2-2]

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The VOC usage at all surface coating operations shall be limited to less than 249 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 249 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.3 Particulate Rules: Particulate Emissions Limitations [326 IAC 6.5-1-2(a)]

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Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) from the following spray booths shall be limited to 0.03 grain per dry standard cubic foot (dscf):

- (a) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7;
- (b) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3;
- (c) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11;
- (d) One (1) toner booth, constructed in March 1986, identified as TB1;
- (e) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8;
- (f) One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB9;
- (g) One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB12;
- (h) Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4;
- (i) One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1; and

- (j) One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1.

#### D.1.4 PM PSD Minor Limitations [326 IAC 2-2]

Compliance with the following limits for the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1, in combination with the PM limits in Condition D.2.3, renders the requirements of 326 IAC 2-2 not applicable to the entire source:

- (a) The coatings applied in the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1, shall be limited such that PM emissions shall be less than a total of 220.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The transfer efficiency of the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1 shall not be less than 40%.
- (c) The control efficiency of the dry filters shall not be less than 90%.

#### D.1.5 PM<sub>2.5</sub> PSD NSR Nonattainment Limitations and Minor PM<sub>10</sub> Limits [326 IAC 2-1.1-5] [326 IAC 2-2]

Compliance with the following limits, in combination with the PM<sub>10</sub> limits in D.2.4, renders the requirements of 326 IAC 2-1.1-5 and 326 IAC 2-2 not applicable to the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1. PM<sub>10</sub> emissions are a surrogate for PM<sub>2.5</sub> emissions.

- (a) The coatings applied in the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, shall be limited such that PM<sub>10</sub> emissions shall be less than a total of 68.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied in the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1, shall be limited such that PM<sub>10</sub> emissions shall be less than a total of 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The transfer efficiency of the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1 shall not be less than 40%.
- (d) The control efficiency of the dry filters shall not be less than 90%.

#### D.1.6 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

#### D.1.7 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use a combination of (A), (B), and (C)
  - (2) Limit VHAP emissions contact adhesives as follows:
    - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
    - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
  - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

#### D.1.8 Work Practice Standards [40 CFR 63.803]

The Permittee shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.

- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

**D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 63, Subpart JJ]**

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

**D.1.11 Volatile Organic Compounds (VOC)**

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

**D.1.12 VOC Emissions**

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**D.1.13 Particulate Matter (PM/PM<sub>10</sub>) Emissions Determination [326 IAC 2-2] [326 IAC 2-1.1-5]**

- (a) Compliance with Condition D.1.4(a) shall be determined by calculating the PM emissions associated with each coating applied in the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12 OFB-1 through OFB-4, TBB-1 and PSB-1, using the following equation:

$$PM = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

- PM = The total PM emissions in tons per month for a given coating.
- CU = The total coating use of a given coating (gallons of a coating per month).
- D = Density of a given coating (pounds of coating per gallon of coating).
- W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).
- TE = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.

CE = Control efficiency (%) of the dry filters. This value shall equal 90%.

The total PM emissions in tons per month from the sixteen (16) spray booths is equal to the sum of the PM emissions associated with each coating applied by those spray booths.

- (b) Compliance with Conditions D.1.5(a) and D.1.5(b) shall be determined by calculating the PM<sub>10</sub> emissions associated with each coating applied in the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and in the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1, using the following equation:

$$PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

PM<sub>10</sub> = The total PM<sub>10</sub> emissions in tons per month for a given coating.

CU = The total coating use of a given coating (gallons of a coating per month).

D = Density of a given coating (pounds of coating per gallon of coating).

W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).

TE = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.

CE = Control efficiency (%) of the dry filters. This value shall equal 90%.

The total PM<sub>10</sub> emissions in tons per month from the ten (10) spray booths is equal to the sum of the PM<sub>10</sub> emissions associated with each coating applied by those spray booths. The total PM<sub>10</sub> emissions in tons per month from the six (6) spray booths is equal to the sum of the PM<sub>10</sub> emissions associated with each coating applied by those spray booths.

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

### D.1.14 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. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission

is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.1.15 Record Keeping Requirements**

---

- (a) To document compliance with Conditions D.1.4(a), D.1.5(a) and D.1.5(b), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM/PM<sub>10</sub> emission limits established in Conditions D.1.4(a), D.1.5(a) and D.1.5(b).
- (1) The amount of each coating material used as (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The density and weight percent solids of each coating material used (as applied).
  - (3) Calculations as determined by Condition D.1.13.
- (b) To document compliance with Condition D.1.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.7.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records

shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (e) To document compliance with Condition D.1.8, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.16 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.2, D.1.4(a), D.1.5(a) and D.1.5(b) 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.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.7 and the Certification form shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
  - (2) July 1 through December 31.
- (c) The reports required in (b) of this condition 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

and

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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas-fired oven, approved for construction in 2007, identified as OFO-1, rated at 1.0 million British thermal units per hour, and with emissions exhausting to stack OF-7. [326 IAC 6.5-1-2]
- (c) Woodworking operations, identified as:
  - (i) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, with a maximum capacity of 5,950 pounds of wood per hour and equipped with two (2) baghouses for particulate control: one with a maximum capacity of 35,000 dscfm and 0.01 gr/dscf and one with a maximum capacity of 30,000 dscfm and 0.01 gr/dscf, and exhausting to stacks C1 and C2, respectively. [326 IAC 6.5-1-2]
  - (ii) Woodworking operations located at Decora Plant #3A, constructed in 1979, identified as MC2, equipped with a baghouse for particulate control, with a maximum capacity of 10,710 pounds of wood per hour and 12,000 dscfm and 0.01 gr/dscf, and exhausting to stack C3. [326 IAC 6.5-1-2]

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

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

#### D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

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

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

#### D.2.2 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the woodworking facilities and the natural gas-fired oven shall be limited to 0.03 grain per dry standard cubic foot.

**D.2.3 PM PSD Minor Limitations [326 IAC 2-2]**

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- (a) The PM emissions from the woodworking operation, identified as MC14, shall not exceed 5.57 pounds per hour.
- (b) The PM emissions from the woodworking operation, identified as MC2, shall not exceed 1.03 pounds per hour.

Compliance with these PM emission limits, in combination with the PM emission limits in Condition D.1.4(a), renders the requirements of 326 IAC 2-2 not applicable.

**D.2.4 PM<sub>2.5</sub> NSR Nonattainment Limitations and Minor PM<sub>10</sub> Limits [326 IAC 2-1.1-5] [326 IAC 2-2]**

---

- (a) The PM<sub>10</sub> emissions from the woodworking operation, identified as MC14, shall not exceed 5.57 pounds per hour.
- (b) The PM<sub>10</sub> emissions from the woodworking operation, identified as MC2, shall not exceed 1.03 pounds per hour.

Compliance with these PM<sub>10</sub> emission limits, in combination with the PM<sub>10</sub> emission limits in Conditions D.1.5(a) and D.1.5(b), renders the requirements of 326 IAC 2-1.1-5 and 326 IAC 2-2 not applicable since PM<sub>10</sub> emissions are a surrogate for PM<sub>2.5</sub> emissions.

**D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the woodworking operations and their control devices.

**Compliance Determination Requirements**

**D.2.6 Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxx)(DD)]**

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The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

**D.2.7 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]**

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

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

**D.2.8 Visible Emissions Notations**

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Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.2.1(c) are not required, and will be replaced by the following:

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

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.9 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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).

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

##### D.2.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.1(c) and Condition D.2.7.
- (b) To document compliance with Condition D.2.1(c) or Condition D.2.8, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhausts. 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 woodworking operations did not operate that day).
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.5-1-2]

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

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

**D.3.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]**

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Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) from the manufacturing activities, identified as MC3, shall be limited to 0.03 grain per dry standard cubic foot (dscf).

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015

**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) \_\_\_\_\_
- 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 DATA SECTION  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<input type="checkbox"/>	1. This is an emergency as defined in 326 IAC 2-7-1(12) X 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 X The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16
<input type="checkbox"/>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) X The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015  
Facilities: All surface coating operations (see D.1)  
Parameter: VOC Limit  
Limit: Less than 249 tons per year  
YEAR: \_\_\_\_\_

Month	VOC (tons)	VOC (tons)	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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015  
Facilities: Sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1  
Parameter: PM Emissions  
Limit: Less than a total of 220.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month (as calculated by Condition D.1.13)

YEAR: \_\_\_\_\_

Month	PM Emissions (tons)	PM Emissions (tons)	PM Emissions (tons)
	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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015  
Facilities: Ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12  
Parameter: PM<sub>10</sub> Emissions  
Limit: Less than a total of 68.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month (as calculated by Condition D.1.13)

YEAR: \_\_\_\_\_

Month	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)
	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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015  
Facilities: Six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1  
Parameter: PM<sub>10</sub> Emissions  
Limit: Less than a total of 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month (as calculated by Condition D.1.13)

YEAR: \_\_\_\_\_

Month	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)
	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: \_\_\_\_\_

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

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT  
Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: MasterBrand Cabinets Plants #2 and #3A  
 Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
 Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
 Part 70 Permit No.: T 037-5929-00015  
 Facility: All Surface Coating (See Section D.1)  
 Parameter: VOC and VHAPs - NESHAP  
 Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids  
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels -  
 3% VHAP content by weight  
 (3) All other thinner mixtures - 10% VHAP content by weight  
 (4) Foam adhesives meeting the upholstered seating flammability requirements -  
 1.8 lb VHAP/lb Solids  
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: \_\_\_\_\_

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1.						
2.						
3.						
4.						
5.						
6.						

- No deviation occurred in this six month period.  
 Deviation/s occurred in this six month period.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for Significant Source and Significant Permit Modifications to a Part 70 Operating Permit

<b>Source Name:</b>	<b>MasterBrand Cabinets, Inc. - Plants #2 and #3A</b>
<b>Source Location:</b>	<b>1 MasterBrand Cabinets Drive, Jasper, Indiana 47546</b>
<b>County:</b>	<b>Dubois</b>
<b>Operation Permit No.:</b>	<b>T 037-5929-00015</b>
<b>Significant Source Modification No.:</b>	<b>SSM 037-24318-00015</b>
<b>Significant Permit Modification No.:</b>	<b>SSM 037-24403-00015</b>
<b>SIC Code:</b>	<b>2434</b>
<b>Permit Reviewer:</b>	<b>Mark L. Kramer/MES</b>

On June 7, 2007, the Office of Air Quality (OAQ) had a notice published in The Herald, Jasper, Indiana, stating that MasterBrand Cabinets, Inc. - Plants #2 and #3A had applied for Significant Source and Significant Permit Modifications to a Part 70 Operating Permit to construct and operate a six (6) spray booths with particulate control and a natural gas-fired oven. The notice also stated that OAQ proposed to issue a Significant Source Modification and a Significant Permit Modification and provided information on how the public could review the proposed Significant Source and Permit Modifications 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 Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following additional changes to the Significant Source and Permit Modifications to a Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### **Change 1:**

Conditions B.12(b)(4) and B.12(b)(5) have been revised to include IDEM's regional office since Dubois County is within the jurisdiction of IDEM's Southwest Regional Office as follows:

#### **B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (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 the 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  
**Telephone Number: 812-380-2305 or 888-672-8323 (Southwest Regional Office)**  
**Facsimile Number: 812-380-2304 (Southwest Regional Office)**

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency 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

**and**

**Indiana Department of Environmental Management  
Southwest Regional Office  
1120 N. Vincennes Avenue  
P.O. Box 128  
Petersburg, Indiana 47567**

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

**Change 2:**

Condition C.1(a) has been revised since the source, located in Jasper, Indiana is in Bainbridge Township and therefore the opacity limit is thirty percent (30%), not forty percent (40%), as follows:

**C.1 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 **thirty percent (30%)** ~~forty percent (40%)~~ in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

**Change 3:**

Condition C.16(c) has been revised as follows:

**C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]**

- (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 avail-

able upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit **other than at a source with a Plantwide Applicability Limitation (PAL)**, which is not part of a "major modification" (as defined in 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

Indiana Department of Environmental Management  
Office of Air Quality

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

Source Description and Location
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Source Name:	MasterBrand Cabinets, Inc. - Plants #2 and #3A
Source Location:	1 MasterBrand Cabinets Drive, Jasper, Indiana 47546
County:	Dubois
SIC Code:	2434
Operation Permit No.:	T 037-5929-00015
Operation Permit Issuance Date:	November 15, 2000
Significant Source Modification No.:	SSM 037-24318-00015
Significant Permit Modification No.:	SPM 037-24403-00015
Permit Reviewer:	Mark L. Kramer/MES

Source Definition
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This wood furniture manufacturing company consists of two (2) plants:

- (a) Plant 2 is located at 1 MasterBrand Cabinets Drive, Jasper, Indiana 47546 and
- (b) Plant 3A is located at 14<sup>th</sup> Street and MasterBrand Cabinets Drive, Jasper, Indiana 47546.

These plants are located on contiguous properties, have the same SIC codes and are under common control. Therefore, they were considered one (1) source, as defined by 326 IAC 2-7-1(22) in the Part 70 Operating Permit T 037-5929-00015 issued on November 15, 2000.

Existing Approvals
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The source was issued a Part 70 Operating Permit T 037-5929-00015 on November 15, 2000. The source has since received the following approvals:

- (a) Minor Source Modification No. 037-12868-00015, issued on December 15, 2000;
- (b) Administrative Amendment No. 037-12882-00015, issued on January 12, 2001;
- (c) Administrative Amendment No. 037-16669-00015, issued on October 30, 2002; and
- (d) Administrative Amendment No. 037-20642-00015, issued on November 15, 2005.

The source also submitted an application for a Part 70 Operating Permit Renewal on February 17, 2005. At this time this application is still under review.

County Attainment Status
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The source is located in Dubois County.

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Basic Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Dubois County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revoking the one-hour ozone standard in Indiana.
- (d) Dubois County has been classified as attainment or unclassifiable in Indiana for all remaining pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (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, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Source Status
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The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Less Than 100
PM <sub>10</sub>	Less Than 100
SO <sub>2</sub>	-
VOC	Less Than 250
CO	-
NO <sub>x</sub>	-

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1 (gg)(1).
- (b) This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or more.
- (c) These emissions are based upon the Technical Support Document for MSM 037-12868-00015, issued December 15, 2000 and the emission calculations presented in Appendix A of this document. There have been no further source modifications since that approval.

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

HAPs	Potential To Emit (tons/year)
Worse Case Single HAP	Greater Than 10
TOTAL	Greater Than 25

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

Actual Emissions
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The following table shows the actual emissions from the source. This information reflects the 2005 emission data provided by MasterBrand Cabinets, Inc.

Pollutant	Actual Emissions (tons/year)
PM <sub>2.5</sub>	Not Reported
PM <sub>10</sub>	5
SO <sub>2</sub>	0
VOC	186
CO	1
NO <sub>x</sub>	1
HAPs	Not Reported

Description of Proposed Modification
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The Office of Air Quality (OAQ) has reviewed a modification application, submitted by MasterBrand Cabinets, Inc. on February 12, 2007, relating to the addition of six (6) spray booths and a natural gas-fired oven to the existing source. The oven is deemed an insignificant activity. These six (6) spray booths are of the same type of spray booths already permitted, spray wood substrates like the existing spray booths and will comply with all existing emission limits at this source. The following is a list of the modified emission units and pollution control devices:

- (a) Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4, using high volume low pressure (HVLP) spray guns with a maximum capacity of 70 wood units per hour, each, and with emissions controlled by dry filters and exhausting to stacks OF-1 through OF-4 at maximum flow rates of 10,000, 10,000, 10,000 and 15,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
- (b) One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1, using high volume low pressure (HVLP) spray guns with a maximum capacity of 350 wood units per hour, and with emissions controlled by dry filters and exhausting to stack TB-1 at a maximum flow rate of 10,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
- (c) One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1, using high volume low pressure (HVLP) high volume low pressure (HVLP) spray guns with a maximum capacity of 175 wood units per hour, and with emissions controlled by dry filters and exhausting to stack PS-1 at a maximum flow rate of 8,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
- (d) One (1) natural gas-fired oven, approved for construction in 2007, identified as OFO-1, rated at 1.0 million British thermal units per hour, and with emissions exhausting to stack OF-7. This oven is deemed an insignificant activity. [326 IAC 6.5-1-2]

Enforcement Issues
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There are no pending enforcement actions related to this modification.

Stack Summary
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(a) Proposed Facilities

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (dcfm)	Temperature (°F)
OFB-1	Manual Off-Line Spray Booth	28.75	2.5	10,000	ambient
OFB-2	Manual Off-Line Spray Booth	28.75	2.5	10,000	ambient
OFB-3	Manual Off-Line Spray Booth	28.75	2.5	10,000	ambient
OFB-4	Manual Off-Line Spray Booth	28.75	2.8	15,000	ambient
TBB-1	Manual Toner-Back Spray Booth	28.75	2.25	10,000	ambient
PSB-1	Manual Pre-Seal Spray Booth	28.75	1.75	8,000	ambient
OFO-1	Natural Gas-Fired Oven	28.75	0.8	1,500	250
			Total Surface Coating Booths Only	63,000	

(b) Existing Spray Booths

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (dcfm)	Temperature (°F)
S1	Spray Booth SB6	28.75	2.0	4,500	Ambient
S2	Spray Booth SB7	28.75	2.0	4,500	Ambient
ST1	Spray Booth STB2	28.75	2.0	4,500	Ambient
ST2	Spray Booth STB3	28.75	2.0	4,500	Ambient
TC1	Spray Booth TCB10	28.75	2.0	4,500	Ambient
TC2	Spray Booth TCB11	28.75	2.0	4,500	Ambient
T1	Spray Booth TB1	28.75	2.5	11,000	Ambient
S3	Spray Booth SB8	28.75	2.5	9,500	Ambient
TC4	Spray Booth TCB9	28.75	2.5	9,500	Ambient
TC3	Spray Booth TCB12	28.75	2.5	6,000	Ambient
			Total	63,000	

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

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

Pollutant	Potential To Emit (tons/year)
PM	355
PM <sub>10</sub>	355
SO <sub>2</sub>	0.003
VOC	2,500
CO	0.368
NO <sub>x</sub>	0.438

HAP	Potential To Emit (tons/year)
Xylene	248
Toluene	7.27
Ethylbenzene	54.0
Dibutyl Phthalate	0.847
Cumene	9.22
Methanol	0.053
MIBK	0.043
Benzene	0.00001
Dichlorobenzene	0.00001
Formaldehyde	0.0003
Hexane	0.008
Lead Compounds	0.000002
Cadmium Compounds	0.000005
Chromium Compounds	0.00001
Manganese Compounds	0.000002
Nickel Compounds	0.00001
TOTAL	319

This source modification is subject to 326 IAC 2-7-10.5. This source modification is processed as a Significant Source Modification pursuant to 326 IAC 2-7-10.5(f)(4) because the potential to emit PM, PM<sub>10</sub> and VOC from this modification is greater than or equal to twenty-five (25) tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a Significant Permit Modification issued pursuant to 326 IAC 2-7-12(d) because it does not qualify as a Minor Permit Modification or as an administrative amendment because this proposed permit modification requires the addition of new PM and PM<sub>10</sub> emission limitations and require significant changes to the existing record keeping and reporting requirements.

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

Process/Emission Unit	Potential to Emit (tons/year)					
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Manual Off-Line Spray Booth (OFB-1)	Less than 250 including the Existing Facilities	Less than 99.0	-	Incorporated into Existing Limit of Less than 249	-	-
Manual Off-Line Spray Booth (OFB-2)			-		-	
Manual Off-Line Spray Booth (OFB-3)			-		-	
Manual Off-Line Spray Booth (OFB-4)			-		-	
Manual Toner-Back Spray Booth (TBB-1)			-		-	
Manual Pre-Seal Spray Booth (PSB-1)			-		-	
Natural Gas-Fired Oven (Insig. Act.)		0.033	0.003	0.024	0.368	0.438
Total for Modification	Less than 250	Less than 100	0.003	Less than 250	0.368	0.438
Major Source Threshold	250	100	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase for all attainment regulated pollutants is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Dubois County has been designated as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM<sub>2.5</sub> Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM<sub>2.5</sub> major NSR regulations, states should assume that a major stationary source's PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions. IDEM will use the PM<sub>10</sub> nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM<sub>2.5</sub> NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment pollutant. The proposed modification to add six (6) spray booths and an oven has a potential to emit of PM<sub>10</sub> of less than one hundred (100) tons per year. Therefore, assuming that PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions, the requirements of nonattainment major NSR do not apply for PM<sub>2.5</sub>.

This modification to an existing minor stationary source is not major because the PM<sub>10</sub> emission increase is less than the nonattainment major NSR source threshold. Therefore, pursuant to 326 IAC 2-1.1-5, the nonattainment major NSR requirements do not apply. After this proposed modification, MasterBrand Cabinets, Inc. will be a major source with respect to PM<sub>2.5</sub> pursuant to nonattainment major NSR since the potential to emit PM<sub>10</sub> is greater than one hundred (100) tons per year as shown in the following table. Furthermore, this modification to an existing minor stationary source is not major because the PM, SO<sub>2</sub>, VOC, CO, and NO<sub>x</sub> emission increases are each less than the PSD major source thresholds.

Process/Emission Unit	Potential to Emit (tons/year)					
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Existing Source	Less than 250	Less than 100	-	Less than 250	-	-
Modification		Less than 100	0.003		0.368	0.438
Entire Source After Modification	Less than 250	Less than 200	-	Less than 250	0.368	0.438
Major Source Threshold	250	100	250	250	250	250

Federal Rule Applicability Determination

The following federal rules were already applicable to the source and are also applicable to this modification:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1 are subject to the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63.800, Subpart JJ) which is incorporated by reference as 326 IAC 20-14 because these new facilities are engaged in the manufacturing of wood furniture components located at a major source of HAPs. The facilities are subject to this rule include the following:
  - (1) Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4, using high volume low pressure (HVLP) spray guns with a maximum capacity of 70 wood units per hour, each, and with emissions controlled by dry filters and exhausting to stacks OF-1 through OF-4 at maximum flow rates of 10,000, 10,000, 10,000 and 15,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
  - (2) One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1, using high volume low pressure (HVLP) spray guns with a maximum capacity of 350 wood units per hour, and with emissions controlled by dry filters and exhausting to stack TB-1 at a maximum flow rate of 10,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
  - (3) One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1, using high volume low pressure (HVLP) high volume low pressure (HVLP) spray guns with a maximum capacity of 175 wood units per hour, and with emissions

controlled by dry filters and exhausting to stack PS-1 at a maximum flow rate of 8,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.

Nonapplicable portions of the NESHAP will not be included in the permit. These emission units are subject to the same portions of Subpart JJ that are already specified in the permit and no additional applicable portions of the NESHAP Subpart JJ apply.

The provisions of 40 CFR 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the six (6) spray booths described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Spray Booth (OFB-1) VOC	None	Y	Greater than 100	Greater than 100	100	N	N
Spray Booth (OFB-1) PM/PM <sub>10</sub>	Dry Filters	Y	Less than 100	Less than 100	100	N	N
Spray Booth (OFB-2) VOC	None	Y	Greater than 100	Greater than 100	100	N	N
Spray Booth (OFB-2) PM/PM <sub>10</sub>	Dry Filters	Y	Less than 100	Less than 100	100	N	N
Spray Booth (OFB-3) VOC	None	Y	Greater than 100	Greater than 100	100	N	N
Spray Booth (OFB-3) PM/PM <sub>10</sub>	Dry Filters	Y	Less than 100	Less than 100	100	N	N
Spray Booth (OFB-4) VOC	None	Y	Greater than 100	Greater than 100	100	N	N
Spray Booth (OFB-4) PM/PM <sub>10</sub>	Dry Filters	Y	Less than 100	Less than 100	100	N	N
Spray Booth (TBB-1) VOC	None	Y	Greater than 100	Greater than 100	100	N	N
Spray Booth (TBB-1) PM/PM <sub>10</sub>	Dry Filters	Y	Less than 100	Less than 100	100	N	N
Spray Booth (PSB-1) VOC	None	Y	Greater than 100	Greater than 100	100	N	N
Spray Booth (PSB-1) PM/PM <sub>10</sub>	Dry Filters	Y	Greater than 100	Less than 100	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the manual pre-seal spray booth, identified as PSB-1 upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

State Rule Applicability Determination

**State Rule Applicability – Entire Source**

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

(a) VOC

The VOC emissions from all surface coating operations at the entire source shall be limited to less than two hundred forty-nine (249) tons per year.

Therefore, this is a minor source pursuant to Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 with respect to this criteria pollutant.

(b) CO and NO<sub>x</sub>

The potential to emit CO and NO<sub>x</sub> from the entire source is less than two hundred and fifty (250) tons per year. Therefore, this is a minor source pursuant to Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 with respect to these criteria pollutants.

(c) PM

Existing Source Prior to the Modification and Proposed Modification

PM emission limits based on the amount of coatings and their solids content delivered to the applicators as well as the control and transfer efficiencies in the existing surface coating operations will be specified to ensure that the existing source with the proposed modification is a PSD minor source with respect to 326 IAC 2-2 (PSD).

The coatings applied in the existing ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and the proposed six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1, shall be limited such that PM emissions shall be less than a total of 220.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This PM emission limitation in combination with the existing PM emissions from the woodworking operations and insignificant activities of less than thirty (30) tons per year renders the requirements of 326 IAC 2-2 not applicable to the entire source since the PM emissions from the entire source shall be limited to less than 250 tons per year.

The PM emissions from the existing woodworking operation, identified as MC14, shall be limited to less than 2.99 pounds per hour from stack C1 and to less than 2.58 pounds per hour from stack C2, equivalent to a total of less than 24.4 tons per year. The PM emissions from the existing woodworking operation, identified as MC2, shall be limited to less than 1.03 pounds per hour from stack C3, equivalent to less 4.51 tons per year. Therefore, the PM emissions from the existing woodworking plus one (1) ton per year from insignificant activities are equal to a total of less than thirty (30) tons per year.

Compliance with the PM emission limitation for the spray booths shall be determined by calculating the PM emissions associated with each coating applied in the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1 using the following equation:

$$PM = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

- PM = The total PM emissions for a given coating (tons per month).
- CU = The total coating use of a given coating (gallons of a coating per month).
- D = Density of a given coating (pounds of coating per gallon of coating).
- W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).
- TE = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.
- CE = Control efficiency (%) of the dry filters. This value shall equal 90%.

The total PM emissions in tons per month from the sixteen (16) spray booths is equal to the sum of the PM emissions associated with each coating applied by those spray booths.

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

Dubois County has been designated as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM<sub>2.5</sub> Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM<sub>2.5</sub> major NSR regulations, states should assume that a major stationary source's PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions. IDEM will use the PM<sub>10</sub> nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM<sub>2.5</sub> NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment pollutant.

##### (a) Existing Source Prior to the Modification

Since the PM<sub>10</sub> emissions from the existing source were not limited, the coatings applied in the existing ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, shall be limited such that PM<sub>10</sub> emissions shall be less than a total of 68.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with PM<sub>10</sub> emission limitation shall be determined by calculating the PM<sub>10</sub> emissions associated with each coating applied in the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12 using the following equation:

$$PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

- $PM_{10}$  = The total  $PM_{10}$  emissions in tons per month for a given coating.
- CU = The total coating use of a given coating (gallons of a coating per month).
- D = Density of a given coating (pounds of coating per gallon of coating).
- W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).
- TE = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.
- CE = Control efficiency (%) of the dry filters. This value shall equal 90%.

The total  $PM_{10}$  emissions in tons per month from the ten (10) spray booths is equal to the sum of the  $PM_{10}$  emissions associated with each coating applied by those spray booths.

Furthermore, the  $PM_{10}$  emissions from the existing woodworking operation, identified as MC14, will be limited to less than 2.99 pounds per hour from stack C1 and to less than 2.58 pounds per hour from stack C2, equivalent to a total of 24.4 tons per year. The  $PM_{10}$  emissions from the existing woodworking operation, identified as MC2, will be limited to less than 1.03 pounds per hour from stack C3, equivalent to less 4.51 tons per year. Therefore, the  $PM_{10}$  emissions from the existing source (woodworking and surface coating of a total of less than 96.9 tons per year), plus one (1) ton per year from non-fugitive existing insignificant activities is less than 97.9 tons per year, which is less than one hundred (100) tons per year. Therefore, the existing source is minor with respect to 326 IAC 2-1.1-5, Nonattainment NSR for  $PM_{2.5}$ .

(b) Proposed Modification

The potential to emit of  $PM_{10}$  will be limited to less than one hundred (100) tons per year for the proposed modification. Therefore, assuming that  $PM_{10}$  emissions represent  $PM_{2.5}$  emissions, the requirements of 326 IAC 2-1.1-5 do not apply for  $PM_{2.5}$ .

The coatings applied in the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1, shall be limited such that  $PM_{10}$  emissions shall be less than a total of 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the  $PM_{10}$  emission limitation shall be determined by calculating the  $PM_{10}$  emissions associated with each coating applied in the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1 using the following equation:

$$PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

- PM<sub>10</sub> = The total PM<sub>10</sub> emissions in tons per month for a given coating.
- CU = The total coating use of a given coating (gallons of a coating per month).
- D = Density of a given coating (pounds of coating per gallon of coating).
- W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).
- TE = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.
- CE = Control efficiency (%) of the dry filters. This value shall equal 90%.

The total PM<sub>10</sub> emissions in tons per month from the six (6) spray booths is equal to the sum of the PM<sub>10</sub> emissions associated with each coating applied by those spray booths.

This modification to an existing minor stationary source is not major because the PM<sub>2.5</sub> emission increase is less than the NSR nonattainment major source threshold. Therefore, pursuant to 326 IAC 2-1.1-5, the NSR nonattainment requirements do not apply.

(c) Entire Source

After this proposed modification, MasterBrand Cabinets, Inc. will be a major source with respect to PM<sub>2.5</sub> pursuant to NSR nonattainment.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year because the potential to emit CO, NO<sub>x</sub> and SO<sub>2</sub> is less than 2,500 tons per year and the potential to emit PM<sub>10</sub> and VOC are less than two hundred fifty (250) tons per year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (b) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

326 IAC 5-1 (Opacity Limitations)

The source is located in Dubois County, however it is not in Bainbridge Township, therefore 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 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.

### **State Rule Applicability – Individual Facilities**

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

Although the operation of this source will emit greater than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs, the requirements of 326 IAC 2-4.1 do not apply to the six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, because although these facilities emit HAPs and will be constructed after the July 27, 1997 applicability date of this rule, these six (6) spray booths are subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ. Therefore, the requirements of 326 IAC 2-4.1-1 are satisfied by compliance with NESHAP Subpart JJ.

#### **326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)**

Since the particulate emission limitations in 326 IAC 6.5-1-2 are more stringent for the six (6) spray booths, the requirements of 326 IAC 6-3-2(d) will not apply to the six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1.

#### **326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

This source is located in Dubois County, and is not specifically listed in 326 IAC 6.5-4. Since the potential PM emissions from this source are greater than one hundred (100) tons per year, the requirements of 326 IAC 6.5-1-2 are applicable. Pursuant to 326 IAC 6.5-1-2, particulate matter shall not exceed 0.03 grains per dry standard cubic foot from the six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1 and the natural gas-fired oven, identified as OFO-1.

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

The six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, equipped with HVLP spray applicators each have a potential to emit VOC of more than fifteen (15) pounds per day. Therefore pursuant to 326 IAC 8-2-1(a)(4) each spray booth is subject to the requirements of 326 IAC 8-2-12 because each spray booth coats wood furnishings, which includes cabinets.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furnishings in the six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, shall utilize one of the following application methods:

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

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

The six (6) spray booths are equipped with high volume low pressure (HVLP) spray applicators, therefore, all six (6) spray booth can comply with this rule.

### 326 IAC 8-11-1 (Wood Furniture Coatings)

This rule only applies to sources located in Lake, Porter, Clark or Floyd County. This source is located in Dubois County, and therefore, the requirements of this rule do not apply to this source.

## 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.

- (a) The compliance determination requirements applicable to this modification are as follows:
  - (1) The six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, have applicable compliance determination conditions as specified below:
    - (A) Compliance with the VOC usage limitations to show compliance with the overall source limit of less than two hundred and fifty (250) tons per twelve (12) consecutive month period with compliance determined at the end of each month shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
    - (B) Compliance with the PM and PM<sub>10</sub> emission limitations shall be determined by calculating the PM and PM<sub>10</sub> emissions associated with each coating applied in the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1 using the following equation:

$$PM/PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

PM/PM<sub>10</sub> = The total PM/PM<sub>10</sub> emissions in tons per month for a given coating.

CU = The total coating use of a given coating (gallons of a coating per month).

D = Density of a given coating (pounds of coating per gallon of coating).

W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).

TE = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.

CE = Control efficiency (%) of the dry filters. This value shall equal 90%.

(2) No stack testing is proposed since the VOC emissions will be calculated based on the MSDS or certified product data sheets and the material usage.

(b) The compliance monitoring requirements applicable to this modification are as follows:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (OF-1, OF-2, OF-3, OF-4, TB-1 and PS-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) The record keeping and reporting requirements applicable to this modification are as follows:

(1) To document compliance with the VOC usage limitation of two hundred and fifty (250) tons per twelve (12) consecutive month period with compliance determined at the end of each month, the Permittee shall maintain records in accordance with (A) through (E) below. Records maintained for (A) through (E) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (A) The VOC content of each coating material and solvent used.
  - (B) The amount of coating material and solvent less water used on monthly basis.
    - (i) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (ii) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (C) The cleanup solvent usage for each month;
  - (D) The total VOC usage for each month; and
  - (E) The weight of VOCs emitted for each compliance period.
- (2) To document compliance with daily and monthly inspections, the Permittee shall maintain a log of weekly overspray observations, and monthly inspections.
  - (3) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
  - (4) A quarterly summary of the information to document compliance with the VOC emission limit and the amount of solids applied to the existing and proposed applicators shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Proposed Changes
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The changes listed below have been made to Part 70 Operating Permit No. T 037-5929-00015. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

**Change 1:**

In Condition A.1, the responsible official has been deleted to eliminate the need to change the permit every time the responsible official changes. The mailing address throughout the permit has been changed from One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546 to 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532. In addition the County and Source Status have been updated:

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

The Permittee owns and operates a stationary wood furniture manufacturing operating.

~~Responsible Official: Mr. Kurt Wanninger~~  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546;  
Mailing Address: ~~One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546~~  
**614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532**  
SIC Code: 2434, 2517  
County Location: Dubois  
County Status: **Nonattainment for PM<sub>2.5</sub>**  
Attainment for all **other** criteria pollutants

Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
**Major Source, under Emission Offset Rules;**  
Major Source, Section 112 of the Clean Air Act  
**Not 1 of 28 Source Categories**

**Change 2:**

The six (6) proposed spray booths have been incorporated in Condition A.2(1)(a) as items (vii) through (ix) and in Condition D.1.1(a). In addition, the two (2) parts booths, identified as PB13 and PB14, and the woodworking operation located in Decora Plant #3A, identified as MC3 have been removed from service and have been deleted. In addition, as a result of deleting the woodworking operation, Section D.2 has been deleted as follows:

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

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

- (1) Surface coating operations, identified as:
  - (a) **Sixteen (16)** ~~Ten (10)~~ surface coating operations, located in Plant #2:
    - (i) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour and with emissions controlled by dry filters and exhausting to stacks S1 and S2 **at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
    - (ii) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour and with emissions controlled by dry filters and exhausting to stacks ST2 and ST1 **at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
    - (iii) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour and with emissions controlled by dry filters and exhausting to stacks TC1 and TC2 **at maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
    - (iv) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack T1 **at a maximum flow rate of 11,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.**
    - (v) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emission controlled by dry filters and exhausting to stack S3 **at a maximum flow rate of 9,500 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a**

**wood furniture manufacturing facility.**

- (vi) **Two (2) One (1) topcoat touch-up booths booth**, constructed in March 1986, identified as **TCB9 and TCB12**, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour **each**, and with emissions controlled by dry filters and exhausting to ~~stack~~ **stacks TC4 and TC3 at maximum flow rates of 9,500 and 6,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
- ~~(vii) One (1) parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks P1 and P2.~~
- ~~(viii) One (1) parts booth, identified as PB14, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 30 parts per hour, and with emissions controlled by dry filters and exhausting to stacks P1 and P2.~~
- (vii) **Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4, using high volume low pressure (HVLP) spray guns with a maximum capacity of 70 wood units per hour, each, and with emissions controlled by dry filters and exhausting to stacks OF-1 through OF-4 at maximum flow rates of 10,000, 10,000, 10,000 and 15,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
- (viii) **One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1, using high volume low pressure (HVLP) spray guns with a maximum capacity of 350 wood units per hour, and with emissions controlled by dry filters and exhausting to stack TB-1 at a maximum flow rate of 10,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.**
- (ix) **One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1, using high volume low pressure (HVLP) high volume low pressure (HVLP) spray guns with a maximum capacity of 175 wood units per hour, and with emissions controlled by dry filters and exhausting to stack PS-1 at a maximum flow rate of 8,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.**

~~(2) Woodworking operations, identified as:~~

- ~~(a) Woodworking operations, located in Decora Plant #3A, identified as MC3, equipped with a baghouse for particulate control with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.~~

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Surface coating operations, identified as:

- (a) **Sixteen (16)** ~~Ten (10)~~ surface coating operations, located in Plant #2:
- (i) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour and with emissions controlled by dry filters and exhausting to stacks S1 and S2 at **maximum** flow rates of 4,500 dscfm, each. **Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
  - (ii) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour and with emissions controlled by dry filters and exhausting to stacks ST2 and ST1 at **maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
  - (iii) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour and with emissions controlled by dry filters and exhausting to stacks TC1 and TC2 at **maximum flow rates of 4,500 dscfm, each. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
  - (iv) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack T1 at a **maximum flow rate of 11,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.**
  - (v) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emission controlled by dry filters and exhausting to stack S3 at a **maximum flow rate of 9,500 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.**
  - (vi) **Two (2)** ~~One (1)~~ topcoat touch-up ~~booths booth~~, constructed in March 1986, identified as **TCB9 and TCB12**, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour **each**, and with emissions controlled by dry filters and exhausting to ~~stack~~ **stacks TC4 and TC3 at maximum flow rates of 9,500 and 6,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.**
  - ~~(vii) One (1) parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks P1 and P2.~~
  - ~~(viii) One (1) parts booth, identified as PB14, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 30 parts per hour, and with emissions controlled by dry filters and exhausting to stacks P1 and P2.~~

- (vii) Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4, using high volume low pressure (HVLP) spray guns with a maximum capacity of 70 wood units per hour, each, and with emissions controlled by dry filters and exhausting to stacks OF-1 through OF-4 at maximum flow rates of 10,000, 10,000, 10,000 and 15,000 dscfm, respectively. Under NESHAP 40 CFR 63, Subpart JJ, these facilities are considered wood furniture manufacturing facilities.
- (viii) One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1, using high volume low pressure (HVLP) spray guns with a maximum capacity of 350 wood units per hour, and with emissions controlled by dry filters and exhausting to stack TB-1 at a maximum flow rate of 10,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.
- (ix) One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1, using high volume low pressure (HVLP) high volume low pressure (HVLP) spray guns with a maximum capacity of 175 wood units per hour, and with emissions controlled by dry filters and exhausting to stack PS-1 at a maximum flow rate of 8,000 dscfm. Under NESHAP 40 CFR 63, Subpart JJ, this facility is considered a wood furniture manufacturing facility.

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

## SECTION D.2 FACILITY OPERATION CONDITIONS

### ~~Facility Description [326 IAC 2-7-5(15)] Woodworking operations, identified as:~~

~~Woodworking operations, located in Decora #3A, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.~~

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

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

#### ~~D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]~~

~~Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the woodworking operations, identified as MC3, shall be limited to 0.03 grain per dry standard cubic foot (dscf).~~

#### ~~D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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

### ~~Compliance Determination Requirements~~

#### ~~D.2.3 Particulate Matter (PM)~~

~~The baghouse for woodworking operations MC3 being used for PM control shall be in operation at all times the woodworking operations are in operation and when exhausting to the atmosphere.~~

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

#### D.2.4 Visible Emissions Notations

- ~~(a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

#### D.2.5 Baghouse Inspections

~~An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations, identified as MC3, when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

#### D.2.6 Broken Bag or Failure Detection

~~In the event that bag failure has been observed:~~

- ~~(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).~~
- ~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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).~~

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

#### D.2.7 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.~~
- ~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.~~

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

**Change 3:**

The insignificant natural gas-fired oven has been incorporated in Condition A.3 and Section D.4 (now Section D.2). In addition, the source has removed the UV Vacuum Coater Line from service and it has been deleted from Condition A.3. In addition, the source has corrected the stack designations to stack C1 and C2 for the insignificant woodworking operation, identified as MC14 and to stack C3 for the insignificant woodworking operation, identified as MC2. The entire Section D.3 has been deleted as follows:

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

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

~~(a) UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.~~

**(a) One (1) natural gas-fired oven, approved for construction in 2007, identified as OFO-1, rated at 1.0 million British thermal units per hour, and with emissions exhausting to stack OF-7. [326 IAC 6.5-1-2]**

**(b) The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.5-1-2]**

**(c) Woodworking operations, identified as:**

**(i) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, with a maximum capacity of 5,950 pounds of wood per hour and equipped with two (2) baghouses for particulate control: one with a maximum capacity of 35,000 dscfm acfm and 0.01 gr/dscf and one with a maximum capacity of 30,000 dscfm acfm and 0.01 gr/dscf, and both exhausting to stacks stack C1 and C2, respectively. [326 IAC 6.5-1-2]**

**(ii) Woodworking operations located at Decora Plant #3A, constructed in 1979, identified as MC2, with a maximum capacity of 10,710 pounds of wood per hour and equipped with a baghouse for particulate control with a maximum capacity of 12,000 dscfm acfm and 0.01 gr/dscf, and exhausting to stack C3 C4. [326 IAC 6.5-1-2]**

**SECTION D.3 FACILITY OPERATION CONDITIONS**

<p>Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:</p> <p>UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.</p> <p><del>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</del></p>
--

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

### **D.3.1 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]**

All surface coating operations combined shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

### **D.3.2 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]**

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

### **D.3.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]**

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of Nov. 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

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

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

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

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

(2) Limit VHAP emissions contact adhesives as follows:

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

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

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

~~(3) — The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.~~

#### ~~D.3.4 — Work Practice Standards [40 CFR 63.803]~~

~~The Permittee shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:~~

- ~~(a) — Operator training course.~~
- ~~(b) — Leak inspection and maintenance plan.~~
- ~~(c) — Cleaning and washoff solvent accounting system.~~
- ~~(d) — Chemical composition of cleaning and washoff solvents.~~
- ~~(e) — Spray booth cleaning.~~
- ~~(f) — Storage requirements.~~
- ~~(g) — Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).~~
- ~~(h) — Line cleaning.~~
- ~~(i) — Gun cleaning.~~
- ~~(j) — Washoff operations.~~
- ~~(k) — Formulation assessment plan for finishing operations.~~

#### ~~D.3.5 — Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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

### **Compliance Determination Requirements**

#### ~~D.3.6 — Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 632, Subpart JJ]~~

~~Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.~~

#### ~~D.3.7 — Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

#### ~~D.3.8 — VOC Emissions~~

~~Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.~~

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

### **~~D.3.9 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. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (b) ~~Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

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

### **~~D.3.10 Record Keeping Requirements~~**

- 
- (a) ~~To document compliance with Condition D.3.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (b) ~~To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.3.3.~~
- 
- (1) ~~Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~
- (2) ~~The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
- (3) ~~The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.~~
- (4) ~~The VHAP content in weight percent of each thinner used.~~
- (5) ~~When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~
- (c) ~~To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.~~

- (1) ~~— The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (2) ~~— A log of the dates of use;~~
- (3) ~~— The cleanup solvent usage for each month;~~
- (4) ~~— The total VOC usage for each month; and~~
- (5) ~~— The weight of VOCs emitted for each compliance period.~~
  
- (d) ~~— To document compliance with Condition D.3.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~
  
- (e) ~~— All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

#### D.3.12 Reporting Requirements

- (a) ~~— A quarterly summary of the information to document compliance with Conditions D.3.1 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.~~
  
- (b) ~~— A semi-annual Continuous Compliance Report to document compliance with Condition D.3.3 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.~~

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

- (1) ~~— January 1 through June 30.~~
- (2) ~~— July 1 through December 31.~~
  
- (c) ~~— The report required in (b) of this condition shall be submitted to:~~

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

~~and~~

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

SECTION D.2 D.4

FACILITY OPERATION CONDITIONS

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

- (a) **One (1) natural gas-fired oven, approved for construction in 2007, identified as OFO-1, rated at 1.0 million British thermal units per hour, and with emissions exhausting to stack OF-7. [326 IAC 6.5-1-2]**
- (c) Woodworking operations, identified as:
  - (i) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, with a maximum capacity of 5,950 pounds of wood per hour and equipped with two (2) baghouses for particulate control: one with a maximum capacity of 35,000 ~~dscfm acfm~~ and 0.01 gr/dscf and one with a maximum capacity of 30,000 ~~dscfm acfm~~ and 0.01 gr/dscf, and both exhausting to ~~stack C1 and C2~~ **stacks stack C1 and C2, respectively. [326 IAC 6.5-1-2]**
  - (ii) Woodworking operations located at Decora Plant #3A, constructed in 1979, identified as MC2, equipped with a baghouse for particulate control, with a maximum capacity of 10,710 pounds of wood per hour and 12,000 ~~dscfm acfm~~ and 0.01 gr/dscf, and exhausting to stack ~~C3 C4~~. **[326 IAC 6.5-1-2]**

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

**Change 4:**

Condition D.1.1 has been revised to delete the reference to the parts booth (PB14) which has been removed from service and add the proposed six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, as follows:

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), **the surface coating applied to wood furnishings in the sealer touch-up booth (SB8), and parts booth (PB14), and the six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, surface coating applied to wood furniture and cabinets** shall utilize one of the following application methods:

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

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

### Change 5:

The rule citations in Condition D.1.2 have been revised. In addition, Condition D.1.2 has been revised to clarify that compliance with the existing surface coating VOC usage limit shall be determined at the end of each month. Due to the additional VOC emitted from the proposed natural gas-fired oven, the VOC usage limit in Condition D.1.2 has been reduced from less than 250 tons per year to less than 249 tons per year. The Quarterly Report form has also been similarly revised and the reference to Section D.3 in the quarterly and semi-annual report forms has been deleted since Section D.3 was deleted.

#### D.1.2 **VOC PSD Minor Limit** [326 IAC 2-2] ~~[40 CFR 52.24]~~

**The VOC usage at all** All surface coating operations shall be limited to less than **249** ~~250~~ tons of VOC, including coatings, dilution solvents, and cleaning solvents, per **twelve (12)** consecutive month period **with compliance determined at the end of each month**. This **usage** limit is required to limit the potential to emit of VOC to less than **249** ~~250~~ tons per **twelve (12)** consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (**PSD**)) ~~and 40 CFR 52.24~~ not applicable.

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

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: ~~One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana, 47546~~  
**614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532**  
Part 70 Permit No.: T 037-5929-00015  
Facilities Facility: All surface coating operations (see D.1 ~~and D.3~~)  
Parameter: VOC Limit  
Limit: **Less than 249** ~~250~~ tons per year

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

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

Source Name: MasterBrand Cabinets Plants #2 and #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
Part 70 Permit No.: T 037-5929-00015  
Facility: All Surface Coating (See **Section** ~~Sections~~ D.1 ~~and D.3~~)

### Change 6:

Condition D.1.3 has been revised to incorporate the six (6) spray booths, identified as OBF-1 through OBF-4, TBB-1 and PSB-1, and delete the two (2) parts booths, identified as PB13 and PB14, incorporate the revised rule cite and delete Condition D.1.3(b):

**D.1.3 Particulate Rules: Particulate Emissions Limitations [326 IAC 6.5-1-2(a)]** ~~[326 IAC 6-1-2]~~

- ~~(a)~~ Pursuant to **326 IAC 6.5-1-2(a)** ~~326 IAC 6-1-2~~, the particulate matter (PM) from the following spray booths shall be limited to 0.03 grain per dry standard cubic foot (dscf):
- ~~(a)~~ ~~(1)~~ Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7;
  - ~~(b)~~ ~~(2)~~ Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3;
  - ~~(c)~~ ~~(3)~~ Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11;
  - ~~(d)~~ ~~(4)~~ One (1) toner booth, constructed in March 1986, identified as TB1;
  - ~~(e)~~ ~~(5)~~ One (1) sealer touch-up booth, constructed in May 1993, identified as SB8;
  - ~~(f)~~ One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB9;
  - ~~(g)~~ ~~(6)~~ One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB12;
  - ~~(7)~~ One (1) parts booth, constructed in 1986, identified as PB13;
  - ~~(8)~~ One (1) parts booth, identified as PB14.
  - (h) Four (4) manual off-line spray booths, approved for construction in 2007, identified as OFB-1 through OFB-4;**
  - (i) One (1) manual toner-back spray booth, approved for construction in 2007, identified as TBB-1; and**
  - (j) One (1) manual pre-seal spray booth, approved for construction in 2007, identified as PSB-1.**
- ~~(b)~~ Any change or modification which may increase the potential to emit of 250 tons per year or more of PM must be approved by the Office of Air Quality before any such change may occur.

**Change 7:**

Condition D.1.4 has been added to incorporate the following practically-enforceable emission limits in order to limit the entire source including woodworking operations and insignificant activities pursuant to 326 IAC 2-2 to less than two hundred fifty (250) tons of PM per year to retain its minor source status. The PM limits for woodworking operations are in Condition D.2.3 which are shown in Change 14.

**D.1.4 PM PSD Minor Limitations [326 IAC 2-2]**

**Compliance with the following limits for the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1, in combination with the PM limits in Condition D.2.3, renders the requirements of 326 IAC 2-2 not applicable to the entire source:**

- (a) The coatings applied in the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1, shall be limited such that PM emissions shall be less than a total of 220.0 tons per twelve (12) consecutive month period with compliance determined at the end of each**

month.

- (b) The transfer efficiency of the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1 shall not be less than 40%.
- (c) The control efficiency of the dry filters shall not be less than 90%.

**Change 8:**

Condition D.1.5 has been added to incorporate the following practically-enforceable emission limits pursuant to 326 IAC 2-1.1-5 in order to limit the existing source to less than one hundred (100) tons per year and in order to limit the proposed modification to less than one hundred (100) tons per year.

**D.1.5 PM<sub>2.5</sub> NSR Nonattainment Limitations and Minor PM<sub>10</sub> Limits [326 IAC 2-1.1-5] [326 IAC 2-2]**  
Compliance with the following limits, in combination with the PM<sub>10</sub> limits in D.2.4, renders the requirements of 326 IAC 2-1.1-5 and 326 IAC 2-2 not applicable to the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1. PM<sub>10</sub> emissions are a surrogate for PM<sub>2.5</sub> emissions.

- (a) The coatings applied in the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, shall be limited such that PM<sub>10</sub> emissions shall be less than a total of 68.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied in the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1, shall be limited such that PM<sub>10</sub> emissions shall be less than a total of 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The transfer efficiency of the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1 shall not be less than 40%.
- (d) The control efficiency of the dry filters shall not be less than 90%.

**Change 9:**

Condition D.1.7 (now D.1.9) has been revised since a Preventive Maintenance Plan is required for the multiple spray surface coating facilities:

**D.1.9 ~~D.1.7~~ Preventive Maintenance Plan [326 IAC 2-7-5(13)]**  
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~these this facilities~~ facility and any control devices.

**Change 10:**

Condition D.1.9 (now D.1.11) has been revised to delete the reference to VOC content limitation since the surface coating operations only have a VOC usage limitation.

**D.1.11 ~~D.1.9~~ Volatile Organic Compounds (VOC)**  
Compliance with the VOC ~~content and usage limitation~~ limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied

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

**Change 11:**

Condition D.1.13 has been added to the Compliance Determination Section to provide the equations that shall be utilized to calculate the PM and PM<sub>10</sub> emission from the existing and proposed spray booths.

**D.1.13 Particulate Matter (PM/PM<sub>10</sub>) Emissions Determination [326 IAC 2-2] [326 IAC 2-1.1-5]**

- (a) Compliance with Condition D.1.4(a) shall be determined by calculating the PM emissions associated with each coating applied in the sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12 OFB-1 through OFB-4, TBB-1 and PSB-1, using the following equation:

$$PM = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

- PM = The total PM emissions in tons per month for a given coating.
- CU = The total coating use of a given coating (gallons of a coating per month).
- D = Density of a given coating (pounds of coating per gallon of coating).
- W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).
- TE = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.
- CE = Control efficiency (%) of the dry filters. This value shall equal 90%.

The total PM emissions in tons per month from the sixteen (16) spray booths is equal to the sum of the PM emissions associated with each coating applied by those spray booths.

- (b) Compliance with Conditions D.1.5(a) and D.1.5(b) shall be determined by calculating the PM<sub>10</sub> emissions associated with each coating applied in the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and in the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1, using the following equation:

$$PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

- PM<sub>10</sub>** = The total PM<sub>10</sub> emissions in tons per month for a given coating.
- CU** = The total coating use of a given coating (gallons of a coating per month).
- D** = Density of a given coating (pounds of coating per gallon of coating).
- W%S** = Weight percent solids of a given coating (pounds of solids per pound of coating).
- TE** = Transfer efficiency (%) of the spray applicators. This value shall equal 40%.
- CE** = Control efficiency (%) of the dry filters. This value shall equal 90%.

The total PM<sub>10</sub> emissions in tons per month from the ten (10) spray booths is equal to the sum of the PM<sub>10</sub> emissions associated with each coating applied by those spray booths. The total PM<sub>10</sub> emissions in tons per month from the six (6) spray booths is equal to the sum of the PM<sub>10</sub> emissions associated with each coating applied by those spray booths.

**Change 12:**

Condition D.1.12(a) (now D.1.15(a)) has been added to require record keeping of the PM and PM<sub>10</sub> emissions from the ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12, and also from the six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1, to document compliance with Conditions D.1.4 and D.1.5.

The reference to additional inspections prescribed by the Preventive Maintenance Plan in Condition D.1.12(a) now (D.1.15(c)) has been deleted. The Preventive Maintenance Plan requirements are described in Condition B.11.

Condition D.1.12(c) (now D.1.15(d)) has been revised to delete the reference to VOC emission limits since the surface coating operations only have a VOC usage limit.

**D.1.15 ~~D.1.12~~ Record Keeping Requirements**

- (a)** To document compliance with Conditions D.1.4(a), D.1.5(a) and D.1.5(b), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM/PM<sub>10</sub> emission limits established in Conditions D.1.4(a), D.1.5(a) and D.1.5(b).
- (1)** The amount of each coating material used as (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2)** The density and weight percent solids of each coating material used (as applied).
  - (3)** Calculations as determined by Condition D.1.13.
- (b)(a)** To document compliance with Condition **D.1.14 ~~D.1.14~~**, the Permittee shall maintain a log of

weekly overspray observations, daily and monthly inspections. ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~

- (c)(b)** To document compliance with Condition **D.1.7** ~~D.1.5~~, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition **D.1.7** ~~D.1.5~~.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (d)(e)** To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage ~~limit limits and/or the VOC emission limits~~ established in Condition D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (e)(d)** To document compliance with Condition **D.1.8** ~~D.1.6~~, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (f)(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Change 13:**

Condition D.1.13 (now D.1.16) has been revised to require the source to document compliance with the amount of solids delivered to the applicators in the existing and proposed spray booths. The address for the Compliance Data Section, Office of Air Quality, has been updated to include the mail code and the additional four (4) digits of the zip code.

In addition quarterly report forms have been added to the proposed permit to document compliance with the PM and PM<sub>10</sub> emissions limits added in Conditions D.1.4 and D.1.5.

The changes are as follows:

**D.1.16** ~~D.1.13~~ Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.2, **D.1.4(a), D.1.5(a) and D.1.5(b)** 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.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition **D.1.7** ~~D.1.5~~ and the Certification form<sub>7</sub>, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (c) The reports required in (b) of this condition 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

and

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

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

**Part 70 Quarterly Report**

**Source Name:** MasterBrand Cabinets Plants #2 and #3A  
**Source Address:** One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
**Mailing Address:** 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
**Part 70 Permit No.:** T 037-5929-00015  
**Facilities:** Ten (10) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9 and TCB12  
**Parameter:** PM<sub>10</sub> Emissions  
**Limit:** Less than a total of 68.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month (as calculated by Condition D.1.13)

YEAR: \_\_\_\_\_

Month	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)
	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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

**Source Name:** MasterBrand Cabinets Plants #2 and #3A  
**Source Address:** One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
**Mailing Address:** 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
**Part 70 Permit No.:** T 037-5929-00015  
**Facilities:** Six (6) spray booths, identified as OFB-1 through OFB-4, TBB-1 and PSB-1  
**Parameter:** PM<sub>10</sub> Emissions  
**Limit:** Less than a total of 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month (as calculated by Condition D.1.13)

**YEAR:** \_\_\_\_\_

Month	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)	PM <sub>10</sub> Emissions (tons)
	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:** \_\_\_\_\_

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

**Part 70 Quarterly Report**

**Source Name:** MasterBrand Cabinets Plants #2 and #3A  
**Source Address:** One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
**Mailing Address:** 614 West 3<sup>rd</sup> Street, Ferdinand, Indiana 47532  
**Part 70 Permit No.:** T 037-5929-00015  
**Facilities:** Sixteen (16) spray booths, identified as SB6, SB7, STB2, STB3, TCB10, TCB11, TB1, SB8, TCB9, TCB12, OFB-1 through OFB-4, TBB-1 and PSB-1  
**Parameter:** PM Emissions  
**Limit:** Less than a total of 220.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month (as calculated by Condition D.1.13)

YEAR: \_\_\_\_\_

Month	PM Emissions (tons)	PM Emissions (tons)	PM Emissions (tons)
	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: \_\_\_\_\_

#### Change 14:

All conditions in Sections D.4 and D.5 (now Sections D.2 and D.3) have been renumbered and Condition D.4.2 (now D.2.2) has been revised to indicate that the 0.03 grain loading limit is also applicable to the proposed oven. In addition, Conditions D.4.5 (now D.2.7), D.4.6 (now D.2.8) and D.4.8 (now D.2.10) have revised since the insignificant woodworking activities exhaust through a stack. Conditions D.2.3 and D.2.4 have been added to incorporate emission limits on PM and PM<sub>10</sub> for the woodworking operations in order to render the requirements of 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable to the existing source:

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

#### D.2.1 D.4.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

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

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

#### D.2.2 D.4.2 Particulate Matter (PM) [326 IAC 6.5-1-2(a)] [326 IAC 6-1-2]

Pursuant to **326 IAC 6.5-1-2(a)** ~~326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations)~~, particulate matter (PM) emissions from the woodworking facilities **and the natural gas-fired oven** shall be limited to 0.03 grain per dry standard cubic foot.

#### D.2.3 PM PSD Minor Limitations [326 IAC 2-2]

- (a) **The PM emissions from the woodworking operation, identified as MC14, shall not exceed 5.57 pounds per hour.**
- (b) **The PM emissions from the woodworking operation, identified as MC2, shall not exceed 1.03 pounds per hour.**

**Compliance with these PM emission limits, in combination with the PM emission limits in Condition D.1.4(a), renders the requirements of 326 IAC 2-2 not applicable.**

#### D.2.4 PM<sub>2.5</sub> NSR Nonattainment Limitations and Minor PM<sub>10</sub> Limits [326 IAC 2-1.1-5] [326 IAC 2-2]

- (a) **The PM<sub>10</sub> emissions from the woodworking operation, identified as MC14, shall not exceed 5.57 pounds per hour.**
- (b) **The PM<sub>10</sub> emissions from the woodworking operation, identified as MC2, shall not exceed 1.03 pounds per hour.**

**Compliance with these PM<sub>10</sub> emission limits, in combination with the PM<sub>10</sub> emission limits in Conditions D.1.5(a) and D.1.5(b), renders the requirements of 326 IAC 2-1.1-5 and 326 IAC 2-2 not applicable since PM<sub>10</sub> emissions are a surrogate for PM<sub>2.5</sub> emissions.**

**D.2.5 ~~D.4.3~~ Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the woodworking operations this facility and their its control devices device.**

Compliance Determination Requirements

**D.2.6 ~~D.4.4~~ Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxx)(DD)]**

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

**D.2.7 ~~D.4.5~~ Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]**

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

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

**D.2.8 ~~D.4.6~~ Visible Emissions Notations**

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition **D.2.1(c) ~~D.4.4(e)~~** are not required, and will be replaced by the following:

- (a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations ~~when exhausting to the atmosphere.~~ A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

**D.2.9 ~~D.4.7~~ Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event

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

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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).

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

**D.2.10** ~~D.4.8~~ Record Keeping Requirements

- (a) To document compliance with Condition **D.2.7** ~~D.4.6~~, the Permittee shall maintain records of the results of the inspections required under Condition **D.2.1(c)** ~~D.4.1(e)~~ and Condition **D.2.7**. ~~D.4.6 and the dates the vents are redirected.~~
- (b) ~~To document compliance with Condition D.4.1(c) or Condition D.4.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.~~  
**To document compliance with Condition D.2.1(c) or Condition D.2.8, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhausts. 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 woodworking operations did not operate that day).**
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION **D.3** ~~D.5~~

FACILITY OPERATION CONDITIONS

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

The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. **[326 IAC 6.5-1-2]**

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

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

**D.3.1** ~~D.5.4~~ Particulate Matter (PM) **[326 IAC 6.5-1-2(a)]** ~~[326 IAC 6-1-2]~~

Pursuant to **326 IAC 6.5-1-2(a)** ~~326 IAC 6-1-2~~, the particulate matter (PM) from the manufacturing activities, identified as MC3, shall be limited to 0.03 grain per dry standard cubic foot (dscf).

**Change 15:**

The phone number in Condition B.12 and the Emergency/Deviation Occurrence Report form have been changed from 317-233-5674 to 317-233-0178 and the fax number has been changed from 317-233-5967 to 317-233-6865.

**Change 16:**

The IDEM mailing address has been supplemented with the ZIP plus 4 of 2251 and the mail code has been added to all addresses throughout the permit as follows:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
**MC 61-50 IGCN 1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
**MC 61-52 IGCN 1003**  
Indianapolis, Indiana 46204-2251

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

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

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

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

**Change 17:**

Condition C.1 has been deleted since the applicable particulate matter limitations is 326 IAC 6.5-1 since the source is not specifically listed in 326 IAC 6.5-4 (Dubois County). Therefore all subsequent Section C Conditions have been renumbered.

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

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

**Change 18:**

Condition C.17 (General Record Keeping Requirements) (now C.16) and Condition C.18 (General Reporting Requirements) (now C.17) have been revised since the source is now major under Emission Offset as follows:

**C.17** ~~General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]~~

- ~~(a) Records of all required monitoring data and support information 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 kept 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) Records of required monitoring information shall include, where applicable:~~
- ~~(1) The date, place, and time of sampling or measurements;~~
  - ~~(2) The dates analyses were performed;~~
  - ~~(3) The company or entity performing the analyses;~~
  - ~~(4) The analytic techniques or methods used;~~
  - ~~(5) The results of such analyses; and~~
  - ~~(6) The operating conditions existing at the time of sampling or measurement.~~
- ~~(c) Support information shall include, where applicable:~~
- ~~(1) Copies of all reports required by this permit;~~
  - ~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
  - ~~(3) All calibration and maintenance records;~~
  - ~~(4) Records of preventive maintenance.~~
- ~~(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

**C.16** **General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]**

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

- (c) If there is a “project” (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, which is not part of a “major modification” (as defined in 326 IAC 2-3-1(z)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(iii); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

~~G.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]~~

- ~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~
- ~~(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~

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

- ~~(c) — Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~
- ~~(d) — Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(e) — All instances of deviations as described in Section B—Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(f) — Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g) — The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.~~

**C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (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.
- (f) If the Permittee is required to comply with the record keeping provisions of (c) in Section C - General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1(qq)), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

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

#### Change 19:

Condition C.14 has been revised to correct the grammar in paragraph (b) by deleting the dash and the word “and” in the phrase one-hundred and twenty (120) as follows:

- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective 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 corrective actions are being implemented.

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

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Conclusion and Recommendation
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The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 037-24318-00015 and Part 70 Significant Permit Modification No. 037-24403-00015. The staff recommends to the Commissioner that the Part 70 Significant Source and Significant Permit Modifications be approved.



**Appendix A: Emissions Calculations  
HAPs  
From Surface Coating Operations**

**Company Name: MasterBrand Cabinets, Inc. Plants #2 and #3A**  
**Address City, IN ZIP: One MasterBrand Cabinets Drive, Jasper, IN 47546**  
**Significant Source Modification Permit Number: SSM 037-24318-00015**  
**Significant Permit Modification Permit Number: SPM 037-24403-00015**  
**Reviewer: Mark L. Kramer/ MES**  
**Date: May 18, 2007**

**Six (6) Spray Booths, Approved for Construction in 2007**

Booth ID	Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Dibutyl Phthalate	Weight % Cumene	Weight % Methanol	Weight % Methyl Isobutyl Ketone	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Dibutyl Phthalate Emissions (ton/yr)	Cumene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)			
OFB-1	Toner (431-D6V-5874-B)	7.01	0.109	70.00	0.005%	0.095%	0.004%	0.079%	0.000%	0.000%	0.004%	0.012	0.223	0.009	0.185	0.000	0.000	0.009			
OFB-2	Stain (542-D6V-4810-C)	7.25	0.141	70.00	0.692%	1.543%	0.148%	0.000%	0.142%	0.017%	0.000%	2.17	4.84	0.464	0.000	0.445	0.053	0.000			
OFB-3	Sealer/Topcoat (831-52L6V-411)	7.74	0.211	70.00	14.380%	0.083%	3.132%	0.000%	0.514%	0.000%	0.000%	72.00	0.416	15.68	0.000	2.57	0.000	0.000			
OFB-4	Toner/Stain/Sealer/Topcoat (831-52L6V-411)	7.74	0.156	70.00	14.380%	0.083%	3.132%	0.000%	0.514%	0.000%	0.000%	53.23	0.307	11.59	0.000	1.90	0.000	0.000			
TBB-1	Toner - Back (431-D6V-5874-B)	7.01	0.078	350.00	0.005%	0.095%	0.004%	0.079%	0.000%	0.000%	0.004%	0.042	0.796	0.034	0.662	0.000	0.000	0.034			
PSB-1	Pre - Seal (831-52L6V-411)	7.74	0.141	175.00	14.380%	0.083%	3.132%	0.000%	0.514%	0.000%	0.000%	120.29	0.694	26.20	0.000	4.30	0.000	0.000			
Worst case coating for each booth was used for determining emissions																					
												Total	247.8	7.27	53.98	0.847	9.22	0.053	0.043		

**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

**Total HAPs** 319.2  
**Proportioned HAPs** 31.8 After VOC Limit of Entire Source Less than 249 TPY of VOC

Appendix A: Emissions Calculations

Company Name: MasterBrand Cabinets, Inc. Plants #2 and #3A  
 Address City, IN ZIP: One MasterBrand Cabinets Drive, Jasper, IN 47546  
 Significant Source Modification Permit Number: SSM 037-24318-00015  
 Significant Permit Modification Permit Number: SPM 037-24403-00015  
 Reviewer: Mark L. Kramer/ MES  
 Date: May 17, 2007

Demonstration of Minor PSD Status of Existing Woodworking Operations Based on Grain Loading and Surface Coating Booths and Minor Status of Proposed Surface Coating Booths

Facility	Grain Loading (gr/dcf)	Air Flow (dscfm)	PM/PM10 (gr/hr)	PM/PM10 (lbs/hr)	PM/PM10 (lbs/yr)	PM/PM10 (tons/yr)	Source Status - Emission Offset
WW-MC14	0.010	65000	39000	5.57	48806	24.4	
WW MC2	0.010	12000	7200	1.03	9010	4.51	
Existing Surface Coating						68.0	
<b>Total</b>						<b>96.9</b>	Minor Existing Source With Respect to PM/PM10
Proposed Six (6) Spray Booths						<b>99.0</b>	Minor Modification to Existing Minor Source With Respect to PM/PM10

Methodology: Grain Loading (gr/dcf) \* Air Flow (dcf/min) \* (60 min/hr) \* (1 lb/7000 grains) \* (8760 hrs/yr) \* (ton/2000 lbs)

Emissions From Natural Gas Combustion

Natural gas-fired oven, identified as OFO-1, deemed an insignificant activity

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.0

8.760

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.008	0.033	0.003	0.438	0.024	0.368

\*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

HAPs Emissions

Emission Factor in lb/MMCF	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000009	0.000005	0.000329	0.007884	0.000015

Emission Factor in lb/MMCF	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.000002	0.000005	0.000006	0.000002	0.000009	<b>0.008</b>

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.