INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 12, 2007

RE: National Office Furniture (N.O.F) Santa Claus / 147-25156-00044

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 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, Suite N 501E, 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.

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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 impractible 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.

Enclosures
FNTV-PMOD.doc12/3/07

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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Parvin Phillips
Environmental Manager
National Office Furniture (N.O.F.) – Santa Claus
1255 West Christmas Boulevard
Santa Claus, Indiana 47579

December 12, 2007

Re: 147-25156-00044
Significant Permit Modification to
Part 70 Permit No.: T 147-6474-00044

Dear Mr. Phillips:

National Office Furniture (N.O.F.) – Santa Claus was issued a Part 70 Operating Permit on March 8, 2001 for the operation of a stationary wood office furniture manufacturing plant. A letter requesting changes to this permit was received on August 17, 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 addition of one (1) UV waterbased wood coating process, subject to the provisions of 40 CFR 63, Subpart JJ, the Wood Furniture Manufacturing Operations National Emission Standards for Hazardous Air Pollutants (NESHAP), consisting of four (4) coating lines, seven (7) sanding/scuffing operations, and two (2) electric ovens.

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 Joe Sachse, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Joe Sachse or extension (4-3350), or dial (317) 234-3350.

Sincerely,

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

Attachments:
Updated Permit
Technical Support Document
PTE Calculations

ajs

cc: File – Spencer County
Spencer County Health Department
U.S. EPA, Region V
Air Compliance Inspector – Derrick Ohning
Compliance Data Section

Permit Reviewer – Joe Sachse
Permits Administration and Development

Mr. Greg Meunier
Director of Operations
National Office Furniture (N.O.F.) – Santa Claus
1255 West Christmas Boulevard
Santa Claus, Indiana 47579

Mr. Stan Schmitt
Environmental Engineer
Kimball International, Inc.
1600 Royal Street
Jasper, Indiana 47549

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(800) 451-6027
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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

National Office Furniture (N.O.F.) – Santa Claus
1255 West Christmas Boulevard
Santa Claus, IN 47579

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

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

This approval 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.: T147-6474-00044	
Issued by: Original Signed By Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 8, 2001 Expiration Date: March 8, 2006

First Administrative Amendment No.: T147-17827-00044, Issued June 24, 2003
Second Administrative Amendment No.: T147-20046-00044, Issued October 18, 2004
Third Administrative Amendment No.: T147-20296-00044, Issued December 8, 2004
Fourth Administrative Amendment No.: T147-20296-00044, Issued June 16, 2005
Fifth Administrative Amendment No.: T147-24806-00044, Issued July 23, 2007

First Significant Permit Modification No.: 147-25156-00044	Pages Affected: Entire Permit
Issued by/Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 12, 2007 Expiration Date: March 8, 2006

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address:	1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Phone Number:	(812) 634-3702
SIC Code:	2517, 2541 and 2521
County Location:	Spencer
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

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

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

(a) Thirty-four (34) surface coating operations consisting of the following:

(1) twenty-eight (28) spray booths using filters for particulate control and identified as:

(A) B1 through B14, constructed in May 1974;

(B) B16 through B23, constructed in May 1974;

(C) B26, constructed in 1987;

(D) B27 through B30, constructed in 1988; and

(E) B33, constructed in 1989;

(2) four (4) roll coating booths, identified as B24 and B25, constructed in May 1974, and B31 and B32, constructed in 1988;

(3) two (2) process dip tanks, identified as B15A, constructed in May 1974, exhausting to stack B15A, and B15B, constructed in 1996, exhausting to stack B15B.

(b) Two (2) spray booths, identified as SB-1 and SB-2, constructed in 1987, with a maximum capacity of 7500 cubic foot per minute, with overspray from the spray booths controlled by dry filters, exhausting to stacks 1 and 2, respectively.

(c) Three (3) dip tanks, identified as DT-1, DT-2 and DT-3, constructed in 1990.

(d) One (1) UV waterbased wood coating process, subject to the provisions of 40 CFR 63, Subpart JJ, the Wood Furniture Manufacturing Operations National Emission Standards for Hazardous Air Pollutants (NESHAP), approved for construction in 2007, consisting of four (4) coating lines, seven (7) sanding/scuffing operations and two (2) electric ovens identified as follows:

(1) One (1) edge roll coating line, identified as UV-1, with a maximum capacity of 80 ft/min, with uncontrolled emissions exhausting to stacks A1 and A2;

(2) One (1) standard flat roll coating line, identified as UV-2, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A3, A4, A5, A6-A, A6-B and A6-C;

(3) One (1) enclosed flat spray coating line, identified as UV-3, with a maximum capacity of 20 ft/min, exhausting to stacks A7-A, A7-B, A8, A9 and A10, with overspray controlled by dry filters, exhausting to B1;

(4) One (1) special product coating line, identified as UV-4, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A11, A12-A and A12-B;

(5) Seven (7) sanding/scuffing operations, identified as UVD1, with a maximum capacity of 40 ft/min, UVD2 and UVD3, both with a maximum capacity of 80 ft/min, UVD4 and UVD5, both with a maximum capacity of 30 ft/min, UVD6, with a maximum capacity of 20 ft/min, and UVD7 with a maximum capacity of 30 ft/min, with particulate emissions controlled by a dust collector, identified as UV-DC1; and

(6) Two (2) electric ovens.

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) Woodworking operations, controlled by four (4) baghouses and two (2) cyclones, in series, identified as:

(1) Moldow 1 baghouse, in series, exhausting to one (1) cyclone, identified as DBW, venting to stack DMW;

(2) Moldow 2 baghouse exhausting to one (1) cyclone, identified as DBE, venting to stack DME; and

(3) Two (2) Torit-Day baghouses exhausting to the stack identified as Torit.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.

(c) Saw dust bins controlled by cyclones and filter socks.

(d) Woodworking operations, controlled by one (1) baghouse, identified as East Torit, and venting to stack 4.

(e) One (1) MDF Powder Coat Systems line, constructed in 2005, consisting of the following:

(1) One (1) primer spray booth controlled by a dry filter integral to the spray booth.

(2) One (1) color coat spray booth, controlled by cyclonic separators, primary and secondary filters integral to the spray booth.

(3) Three (3) natural gas supplied flameless catalytic infrared heaters, identified as Pre-Heat Oven, Pre-Gel Oven, and Cure-Oven, each installed in 2005, with maximum rated capacities of 0.544, 0.828 and 1.959 million British Thermal Units per hour, respectively.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

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.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

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

(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) If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, 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, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) 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.

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. One (1) certification can cover multiple forms in one (1) 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]

(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 submittal of the PMPs 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]

(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, 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.

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) 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 accordance 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] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) 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, 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 Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit 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) 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) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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 noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 a reasonable 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]

(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).

(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)]

(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]

(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 source modification 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). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted 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] [326 IAC 2-7-10.5]

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

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

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.

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 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 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

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

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.

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

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

C.7 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.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61]

(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.10 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.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance, or by a later date specified by an applicable requirement. 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, or by a later date specified by an applicable requirement.

C.13 Monitoring Methods [326 IAC 3]

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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

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

(c) 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.

(d) 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.

(e) 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.

(f) 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.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 of 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. CRPs 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.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within normal 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.17 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.18 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) 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. 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-1.1-11]

(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 within a reasonable time. 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source 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, any quarterly 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 require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) Thirty-four (34) surface coating operations consisting of the following:

(1) Twenty-eight (28) spray booths using filters for particulate control and identified as:

(A) B1 through B14, constructed in May 1974;

(B) B16 through B23, constructed in May 1974;

(C) B26, constructed in 1987;

(D) B27 through B30, constructed in 1988; and

(E) B33, constructed in 1989;

(2) Four (4) roll coating booths, identified as B24 and B25, constructed in May 1974, and B31 and B32, constructed in 1988;

(3) Two (2) process dip tanks, identified as B15A, constructed in May 1974, exhausting to stack B15A, and B15B, constructed in 1996, exhausting to stack B15B.

(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 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall use less than 250 tons of VOC, including coatings and dilution solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (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.1.2 Source Modification Emission Limitations [326 IAC 2-7-10.5]

The spray booth B26 was registered on June 17, 1987 and emits less than 25 tons per year of VOCs. Therefore, any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from spray booth B26 must be approved by the Office of Air Quality (OAQ) before such a change may occur.

D.1.3 Source Modification Emission Limitations [326 IAC 2-7-10.5]

The spray booths B27 through B30 and roll coating lines B32 and B33 were registered on April 8, 1988 and emit less than 25 tons per year of VOCs. Therefore, any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from either spray booth B27, B28, B29, B30, B32 or B33 must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.1.4 Source Modification Emission Limitations [326 IAC 2-7-10.5]

The spray booth B31 was registered on July 29, 1987 and emits less than 25 tons per year of VOCs. Therefore, any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from spray booth B31 must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.1.5 Source Modification Emission Limitations [326 IAC 2-7-10.5]

Any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from B15A or B15B must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets from the one (1) dip tank, identified as B15B, 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.1.7 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.1.8 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

(a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 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, as applied; 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 any combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) Use compliant contact adhesives as follows:

(i) 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;

(ii) 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;

or

(B) 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, as applied.

D.1.9 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). 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.1.10 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the allowable particulate matter emission rate from the surface coating operation shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.11 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.1.12 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

(a) 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.

(b) The Permittee is not required to test these facilities by this permit.

D.1.13 VOC Emission Determination [326 IAC 2-2] [40 CFR 52.21]

To document compliance with Condition D.1.1, the Permittee shall maintain complete and sufficient records as follows:

(a) The amount and VOC content of each coating material and solvent used.

(b) The total VOC emissions for each month. VOC emissions for each month shall be determined through a mass balance calculation whereby VOC emissions equal the sum of VOC inventory at the beginning of the month plus any VOC received onsite during the month, minus the sum of VOC remaining in inventory at the end of the month and any unused VOC transferred offsite during the month. The VOC content of waste shipped offsite for disposal may also be deducted in calculating the total VOC emissions, if desired.

(c) Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within thirty (30) days of the end of each month based on the total calculated VOC emissions for the most recent twelve (12) month period.

D.1.14 VOC and VHAP Limitations [326 IAC 8-1-2] [326 IAC 8-1-4] [40 CFR 63.804 and 63.805]

Compliance with the VOC and VHAP limitations contained in Conditions D.1.1 and D.1.8 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.

D.1.15 Operator Training for PM Control

(a) The Permittee shall implement an operator-training program:

(1) All operators of spray coating booths shall be trained in the proper setup and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.

(3) All operators shall be given refresher training annually.

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

D.1.16 Particulate Matter (PM)

The dry filters for particulate matter (PM) overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

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

D.1.17 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.13, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VOC emission limit and VOC emission determination requirements established in Conditions D.1.1 and D.1.13.

(1) The amount and VOC content of each coating material and solvent used. Records shall include:

(A) Purchase orders, invoices, and any other tracking records necessary to verify the amount of each product received onsite and any shipped offsite, and the amount of each product dispensed from inventory to the coating area and any returned to inventory from the coating area, and

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material used shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.

(2) The amount of VOC drummed and shipped offsite each month for disposal as waste, if the waste VOC is deducted from the total reported VOC usage. Records shall include:

(A) The amount and VOC content of each used coating material and solvent collected for disposal offsite. Records shall include Hazardous Waste Reclamation Record sheets, or equivalent, with an entry made each time additional material is placed in a waste collection drum. Each entry shall note the complete product name or product number of the material and the quantity of material placed in the drum.

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material placed in the drum.

(3) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.8, 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.1.8.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP 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 spray booth 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.1.9, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(d) To document compliance with Conditions D.1.15 and D.1.16, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.18 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.19 Reporting Requirements: NESHAP

(a) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.8 and the Certification form shall be submitted within thirty (30) days after the end of the six (6) months being reported, on a calendar year basis with the reporting periods ending June 30 and December 31.

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

(1) January 1 through June 30.

(2) July 1 through December 31.

(b) The report required in (a) 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) Woodworking operations, controlled by four (4) baghouses and two (2) cyclones in series, identified as:

(1) Moldow 1 baghouse in series exhausting to one (1) cyclone, identified as DBW, venting to stack DMW, and

(2) Moldow 2 baghouse exhausting to one (1) cyclone, identified as DBE, venting to stack DME, and

(3) Two (2) Torit-Day baghouses exhausting to the stack identified as Torit.

(b) Woodworking operation, controlled by one (1) baghouse, identified as East Torit, and venting to stack 4.

(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 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operation), the allowable particulate matter emission rate from the woodworking facilities shall not exceed the following:

(a) The PM emission from the wood working operation that exhausts through stack DME (MOLDOW MX 2 units) shall not exceed 17.87 pounds per hour when operating at a process weight rate of 9 tons per hour.

(b) The PM emission from the wood working operation that exhausts through stack DMW (MOLDOW MX 1 unit) shall not exceed 11.65 pounds per hour when operating at a process weight rate of 4.75 tons per hour.

(c) The PM emission from the wood working operation that exhausts through stack TORIT shall not exceed 5.14 pounds per hour when operating at a process weight rate of 1.4 tons per hour.

(d) The PM emission from the wood working operation that exhausts through stack 4 shall not exceed 7.06 pounds per hour when operating at a process weight rate of 2.25 tons per hour.

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

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

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

D.2.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations controlled by three (3) baghouses 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)(xxix), including the following:

(a) each baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns (PM_{10}) in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.

(b) The opacity from each baghouse shall not exceed ten percent (10%).

D.2.3 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

The woodworking operations controlled by two (2) baghouses, identified as Torit-Day 1 and Torit-Day 2, 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 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 (PM_{10}) 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%).

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 2-7-1(21)(G)(xxx)]

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

D.2.6 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 2-7-1(21)(G)(xxx)]

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:

(a) The baghouse shall be inspected.

(b) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

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

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. Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

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

D.2.8 Broken or Failed Bag Detection

In the event of a bag failure that causes the baghouse to emit visible emissions:

(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.2.9 Record Keeping Requirements [326 IAC 2-7-1(21)(G)(xxix)(GG)] [326 IAC 2-7-1(21)(G)(xxx)]

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission observations of each baghouse stack exhaust.

(b) To document compliance with Conditions D.2.6 and D.2.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6 and D.2.7 and the dates the vents are redirected.

(c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd) and 326 IAC 2-7-1(21)(G)(xxx).

(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

(a) Two (2) spray booths, identified as SB-1 and SB-2, constructed in 1987, with a maximum capacity of 7500 cubic foot per minute, with overspray from the spray booths controlled by dry filters, exhausting to stacks 1 and 2, respectively.

(b) Three (3) dip tanks, identified as DT-1, DT-2 and DT-3, constructed in 1990.

(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 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall use less then 250 tons of VOC, including coatings, dilution solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (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 Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

(a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 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, as applied; 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 any combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) Use compliant contact adhesives as follows:

(i) 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;

(ii) 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;

or

(B) 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, as applied.

D.3.4 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). 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 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the allowable particulate matter emission rate from surface coating operation shall not exceed the pound per hour emission rate established as E in the following formula:

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

D.3.6 Source Modification Emission Limitations [326 IAC 2-7-10.5]

Any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from DT-1, DT-2 or DT-3 must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.3.7 Source Modification Emission Limitations [326 IAC 2-7-10.5]

Pursuant to Registration letter, issued on December 16, 1987, any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from SB-1 or SB-2 must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.3.8 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.3.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

(a) 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.

(b) The Permittee is not required to test these facilities by this permit.

D.3.10 VOC Emission Determination [326 IAC 2-2] [40 CFR 52.21]

To document compliance with Condition D.3.1, the Permittee shall maintain complete and sufficient records as follows:

(a) The amount and VOC content of each coating material and solvent used.

(b) The total VOC emissions for each month. VOC emissions for each month shall be determined through a mass balance calculation whereby VOC emissions equal the sum of VOC inventory at the beginning of the month plus any VOC received onsite during the month, minus the sum of VOC remaining in inventory at the end of the month and any unused VOC transferred offsite during the month. The VOC content of waste shipped offsite for disposal may also be deducted in calculating the total VOC emissions, if desired.

(c) Compliance with Condition D.3.1 shall be demonstrated within thirty (30) days of the end of each month based on the total calculated VOC emissions for the most recent twelve (12) month period.

D.3.11 VOC and VHAP Limitations [326 IAC 8-1-2] [326 IAC 8-1-4] [40 CFR 63.804 and 63.805]

Compliance with the VOC and VHAP 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.

D.3.12 Operator Training for PM Control

(a) The Permittee shall implement an operator-training program:

(1) All operators of spray coating booths shall be trained in the proper setup and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.

(3) All operators shall be given refresher training annually.

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

D.3.13 Particulate Matter (PM)

The dry filters for particulate matter (PM) overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

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

D.3.14 Record Keeping Requirements

(a) To document compliance with Condition D.3.1 and Condition D.3.10, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VOC emission limit and VOC emission determination requirements established in Conditions D.3.1 and D.3.10.

(1) The amount and VOC content of each coating material and solvent used. Records shall include:

(A) Purchase orders, invoices, and any other tracking records necessary to verify the amount of each product received onsite and any shipped offsite, and the amount of each product dispensed from inventory to the coating area and any returned to inventory from the coating area, and

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material used shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.

(2) The amount of VOC drummed and shipped offsite each month for disposal as waste, if the waste VOC is deducted from the total reported VOC usage. Records shall include:

(A) The amount and VOC content of each used coating material and solvent collected for disposal offsite. Records shall include Hazardous Waste Reclamation Record sheets, or equivalent, with an entry made each time additional material is placed in a waste collection drum. Each entry shall note the complete product name or product number of the material and the quantity of material placed in the drum.

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material placed in the drum.

(3) The weight of VOCs emitted for each compliance period.

(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 VHAP 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 spray booth 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.3.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(d) To document compliance with Conditions D.3.6 and D.3.7, the Permittee shall maintain records to establish compliance with 25 tons per year, or less, potential of VOC.

(e) To document compliance with Conditions D.3.12 and D.3.13, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.3.15 Reporting Requirements: PSD Minor Limit

A quarterly summary of the information to document compliance with Condition 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. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.3.16 Reporting Requirements: NESHAP

(a) 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, on a calendar year basis with the reporting periods ending June 30 and December 31.

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

(1) January 1 through June 30.

(2) July 1 through December 31.

(b) The report required in (a) 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.4 FACILITY OPERATION CONDITIONS

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

(e) One (1) MDF Powder Coat Systems line, constructed in 2005, consisting of the following:

(1) One (1) primer spray booth controlled by a dry filter integral to the spray booth.

(2) One (1) color coat spray booth, controlled by cyclonic separators, primary and secondary filters integral to the spray booth.

(3) Three (3) natural gas supplied flameless catalytic infrared heaters, identified as Pre-Heat Oven, Pre-Gel Oven, and Cure-Oven, each installed in 2005, with maximum rated capacities of 0.544, 0.828, and 1.959 million British Thermal Units per hour, respectively.

(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.4.1 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.4.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

(a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1. The Permittee shall comply with the requirements of this condition upon startup.

(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, as applied; 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 any combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) Use compliant contact adhesives as follows:

(i) 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;

(ii) 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;

or

(B) 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, as applied.

D.4.3 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). 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.4.4 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from MDF Powder Coat Systems Line shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.4.5 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the spray booths shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

D.4.6 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.4.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

(a) 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.

(b) The Permittee is not required to test these facilities by this permit.

D.4.8 VOC and VHAP Limitations [40 CFR 63.804 and 63.805]

Compliance with the VOC and VHAP limitations contained in Condition D.4.2 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.

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

D.4.9 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 and cyclonic separators, weekly observations shall be made of the overspray from the surface coating booth stack 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.4.10 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the process when venting to the atmosphere. A cyclone 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. Inspections required by this condition shall not be performed in consecutive months.

D.4.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.4.12 Record Keeping Requirements

(a) To document compliance with Condition D.4.2, 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.4.2.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP 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 spray booth 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.

(b) To document compliance with Condition D.4.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(c) To document compliance with Conditions D.4.5 and D.4.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.4.10, the Permittee shall maintain records of the results of the inspections required under Condition D.4.10

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

D.4.13 Reporting Requirements: NESHAP

(a) A semi-annual Continuous Compliance Report to document compliance with Condition D.4.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported, on a calendar year basis with the reporting periods ending June 30 and December 31.

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

(1) January 1 through June 30.

(2) July 1 through December 31.

(b) The report required in (a) 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.5 FACILITY OPERATION CONDITIONS

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

One (1) UV waterbased wood coating process, subject to the provisions of 40 CFR 63, Subpart JJ, the Wood Furniture Manufacturing Operations National Emission Standards for Hazardous Air Pollutants (NESHAP), approved for construction in 2007, consisting of four (4) coating lines, seven (7) sanding/scuffing operations, and two (2) electric ovens, identified as follows:

(1) One (1) edge roll coating line, identified as UV-1, with a maximum capacity of 80 ft/min, with uncontrolled emissions exhausting to stacks A1 and A2;

(2) One (1) standard flat roll coating line, identified as UV-2, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A3, A4, A5, A6-A, A6-B and A6-C;

(3) One (1) enclosed flat spray coating line, identified as UV-3, with a maximum capacity of 20 ft/min, exhausting to stacks A7-A, A7-B, A8, A9 and A10, with overspray controlled by dry filters, exhausting to stack B1;

(4) One (1) special product coating line, identified as UV-4, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A11, A12-A and A12-B;

(5) Seven (7) sanding/scuffing operations, identified as UVD1, with a maximum capacity of 40 ft/min, UVD2 and UVD3, both with a maximum capacity of 80 ft/min, UVD4 and UVD5, both with a maximum capacity of 30 ft/min, UVD6, with a maximum capacity of 20 ft/min, and UVD7 with a maximum capacity of 30 ft/min, with particulate emissions controlled by a dust collector, identified as UV-DC1; and

(6) Two (2) electric ovens.

(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.5.1 PSD Minor Limit [326 IAC 2-2]

The entire source shall use less than 250 tons of VOC, including coatings and dilution solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.5.3 Minor Source Modification Limits [326 IAC 2-7-10.5(d)(4)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(4)(C), particulate matter (PM) from the dust collector (UV-DC1), used to control PM from the UV waterbased wood coating process, shall be limited to less than twenty-five (25) tons per year and shall comply with the following limits:

(a) Operate with a control efficiency of at least ninety-nine percent (99%);
(b) Have no visible emissions; and
(c) The PM and PM_{10} emissions from the dust collector (UV-DC1) shall be less than 5.71 lb/hr and 3.42 lb/hr, respectively. Compliance with these limits shall result in actual emissions of less than twenty-five (25) tons per year of PM and fifteen (15) tons per year of PM_{10}.

D.5.4 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the flat spray coating line, UV-3, shall be controlled by a dry filter, and the Permittee shall operate the filter in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the seven (7) sanding/scuffing operations associated with the UV waterbased wood coating process shall not exceed 53.13 pounds per hour when operating at a process weight rate of 120 tons per hour.

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

Interpolation and extrapolation of the data for process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

D.5.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets from each of the four coating lines, UV-1, UV-2, UV-3 and UV-4, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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.5.6 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.5.7 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

(a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 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, as applied; 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 any combination of (A), (B) and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) Use compliant contact adhesives as follows:

(i) 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;

(ii) 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;

or

(B) 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, as applied.

D.5.8 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). 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.

Compliance Determination Requirements

D.5.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

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.5.10 Operator Training for PM Control

(a) The Permittee shall implement an operator-training program:

(1) All operators of spray coating line shall be trained in the proper setup and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection, maintenance and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.

(3) All operators shall be given refresher training annually.

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

D.5.11 Particulate [326 IAC 6-3-2]

(a) In order to comply with Condition D.5.4(a), the dry filters for particulate matter (PM) overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the spray coating line is in operation.

(b) In order to comply with Condition D.5.4(b), the dust collector for particulate control shall be in operation and control emissions from the UV waterbased wood coating process at all times the UV waterbased wood coating process is in operation.

(c) In the event that failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.5.12 VOC and VHAP Limitations [326 IAC 8-1-2] [326 IAC 8-1-4] [40 CFR 63.804 and 63.805]

Compliance with the VOC and VHAP limitations contained in Conditions D.5.1 and D.5.7 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.

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

D.5.13 Visible Emissions Notations

(a) Visible emissions shall be observed daily and performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Corrective Actions and Response Steps. Failure to take response steps in accordance with Section C – Corrective Actions and Response Steps, shall be considered a deviation from this permit.

D.5.14 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for spray coating line UV-3. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating line stack UV3-B1, while UV-3 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Monitoring Plan - Failure to Take Response Steps. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from UV-3 surface coating line stack UV3-B1, and of the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Monitoring Plan - Failure to Take Response Steps. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.

D.5.15 Broken or Failed Dust Collector

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

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

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

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

D.5.16 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VOC emission limit and VOC emission determination requirements established in Condition D.5.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include:

(A) Purchase orders, invoices, and any other tracking records necessary to verify the amount of each product received onsite and any shipped offsite, and the amount of each product dispensed from inventory to the coating area and any returned to inventory from the coating area, and

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material used shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.

(2) The amount of VOC drummed and shipped offsite each month for disposal as waste, if the waste VOC is deducted from the total reported VOC usage. Records shall include:

(A) The amount and VOC content of each used coating material and solvent collected for disposal offsite. Records shall include Hazardous Waste Reclamation Record sheets, or equivalent, with an entry made each time additional material is placed in a waste collection drum. Each entry shall note the complete product name or product number of the material and the quantity of material placed in the drum.

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material placed in the drum.

(3) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.5.7, 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.5.7.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP 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 spray booth 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.5.11, the Permittee shall maintain a copy of the operator-training program and training records.

(d) To document compliance with Conditions D.5.4(a) and D.5.14, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

(e) To document compliance with Condition D.5.14, the Permittee shall maintain daily records of the visible emission notations of the dust collector. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).

D.5.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.1 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. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: National Office Furniture (N.O.F.) - Santa Claus
Source Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Part 70 Permit No.: T147-6474-00044

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 BRANCH
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 OCCURRENCE REPORT

Source Name: National Office Furniture (N.O.F.) - Santa Claus
Source Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Part 70 Permit No.: T147-6474-00044

This form consists of 2 pages **Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe: Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: National Office Furniture (N.O.F.) - Santa Claus
Source Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Part 70 Permit No.: T147-6474-00044
Facility: Surface Coating Operations listed in Sections D.1, D.3, D.4 and D.5 of this permit
Parameter: VOCs
Limit: Less than 250 tons of VOC, including coatings, dilution solvents, per twelve (12) consecutive month period

QUARTER: YEAR:

Month	VOC usage tons per month	tons of VOC usage for previous 12 months
Month 1		
Month 2		
Month 3		

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: National Office Furniture (N.O.F.) - Santa Claus
Source Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Part 70 Permit No.: T147-6474-00044
Facility: surface coating operation, identified as B26
Parameter: VOC limits
Limit: Less than 25.0 tons per year for each spray booth

YEAR:

Month	Tons of VOCs	Tons of VOCs	Tons of VOCs	Tons of VOCs
	Paint Booths			Total
Month 1				
Month 2				
Month 3				

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: National Office Furniture (N.O.F.) - Santa Claus
Source Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Part 70 Permit No.: T147-6474-00044

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

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period."
NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
Semi-Annual Report
VOC and VHAP Usage - Wood Furniture Manufacturing Operations NESHAP

Source Name: National Office Furniture (N.O.F.) - Santa Claus
Source Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Part 70 Permit No.: T147-6474-00044
Facility: All Surface Coating Operations
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) 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:_____

Page 1 of 2

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	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: _____

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 Manufacturing Operations NESHAP

Source Name: National Office Furniture (N.O.F.) - Santa Claus
Source Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Mailing Address: 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
Part 70 Permit No.: T147-6474-00044
Facility: All Surface Coating Operations
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) 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:_____

Page 2 of 2

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	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: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and Significant Permit Modification

Source Description and Location

Source Name:	National Office Furniture (NOF) – Santa Claus
Source Location:	1255 West Christmas Boulevard, Santa Claus, Indiana 47579
County:	Spencer
SIC Code:	2517, 2541 and 2521
Operation Permit No.:	T 147-6474-00044
Operation Permit Issuance Date:	March 8, 2001
Minor Source Modification No.:	147-25154-00044
Significant Permit Modification No.:	147-25156-00044
Permit Reviewer:	Joe Sachse

Source Definition

(a) This operation of a wood furniture products manufacturing company consists of two (2) plants:

(1) National Office Furniture (NOF) – Santa Claus is located at 1255 West Christmas Boulevard, Santa Claus, Indiana 47579; and

(2) Kimball Office Casegoods Manufacturing - Santa Claus is located at Highway 162, Santa Claus, Indiana 47579.

However, since the two (2) plants are located on contiguous properties, have the same two digit SIC codes and are owned by one (1) company, they will be considered one (1) source, as defined by 326 IAC 2-7-1(22), being issued one Title V permit: T147-6474 and one plant identification number: 147-00044.

(b) Kimball International Santa Claus Industrial Complex, Inc. and Dale-Wood Manufacturing were determined to be 2 sources on July 9, 1998. Both facilities are under common control or common ownership. However, each company has a different two digit SIC code and the companies are located 5 miles apart without support.

Existing Approvals

The source was issued Part 70 Operating Permit No. 147-6474-00044 on March 8, 2001. The source has since received the following approvals:

(a) First Administrative Amendment No. 147-17827-00044, issued on June 24, 2003;

(b) Second Administrative Amendment No. 147-20046-00044, issued on October 18, 2004;

(c) Third Administrative Amendment No. 147-20296-00044, issued on December 8, 2004;

(d) Fourth Administrative Amendment No. 147-20986-00044, issued on June 16, 2005; and

(e) Fifth Administrative Amendment No. 147-24806-00044, issued on July 23, 2007.

Part 70 Operating Permit Renewal No. 147-21266-00044 is still under review.

County Attainment Status

The source is located in Clay Township of Spencer County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Spencer County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. For rule applicability to the source, see the State Rule Applicability Determination section.

(b) Clay Township of Spencer County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. For rule applicability to the source, see the State Rule Applicability Determination section. The source is not located in Ohio Township of Spencer County, which the U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated as nonattainment for PM2.5.

(c) Spencer County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. For rule applicability to the source, see the State Rule Applicability Determination section.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

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 (TPY)
PM	249
PM10	249
SO_2	0
VOC	246
CO	0
NO_x	0

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) These emissions are based upon Operating Permit No. T147-6474-00044.

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	PTE (TPY)
Single HAP	greater than 10
Combined HAPs	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

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emission data.

Pollutant	Actual Emissions (TPY)
PM	6.43
PM10	0.56
SO_2	0.00
VOC	78.48
CO	0.00
NO_x	0.00

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by National Office Furniture (NOF) – Santa Claus on August 17, 2007, relating to the addition of one (1) ultraviolet (UV) waterbased wood coating process.

The following is a list of the proposed emission units and pollution control devices:

The UV waterbased wood coating process, subject to the provisions of 40 CFR 63,

Subpart JJ, the Wood Furniture Manufacturing Operations National Emission Standards for Hazardous Air Pollutants (NESHAP), approved for construction in 2007, consists of four (4) coating lines, seven (7) sanding/scuffing operations, and two (2) electric ovens identified as follows:

(1) One (1) edge roll coating line, identified as UV-1, with a maximum capacity of 80 ft/min, with uncontrolled emissions exhausting to stacks A1 and A2;

(2) One (1) standard flat roll coating line, identified as UV-2, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A3, A4, A5, A6-A, A6-B and A6-C;

(3) One (1) enclosed flat spray coating line, identified as UV-3, with a maximum capacity of 20 ft/min, exhausting to stacks A7-A, A7-B, A8, A9 and A10, with overspray controlled by dry filters, exhausting to B1;

(4) One (1) special product coating line, identified as UV-4, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A11, A12-A and A12-B;

(5) Seven (7) sanding/scuffing operations, identified as UVD1, UVD2, UVD3, UVD4, UVD5, UVD6 and UVD7, with particulate emissions controlled by a dust collector with a total maximum capacity of 40 lb/hr, identified as UV-DC1; and

(6) Two (2) electric ovens.

Enforcement Issues

There are no pending enforcement actions regarding this proposed modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
UV1-A1	UV1	32.00	0.58	589	160
UV1-A2	UV1	32.00	0.50	589	160
UV2-A3	UV2	32.00	0.67	589	160
UV2-A4	UV2	32.00	0.67	589	160
UV2-A5	UV2	32.00	0.67	589	160
UV2-A6-A	UV2	32.00	0.67	589	160
UV2-A6-B	UV2	32.00	0.67	589	160
UV2-A6-C	UV2	32.00	0.67	589	160
UV3-A7-A	UV3	32.00	0.67	706	160
UV3-A7-B	UV3	32.00	0.67	706	160
UV3-A8	UV3	32.00	0.58	882	160
UV3-A9	UV3	32.00	1.00	2,354	160
UV3-A10	UV3	32.00	0.83	1,177	160
UV4-A11	UV4	33.00	1.50	1,767	160
UV4-A12-A	UV4	32.00	0.67	589	160
UV4-A12-B	UV4	32.00	0.67	589	160
UV3-B1	UV3	32.00	2.25	10,595	110

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 tables are 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	PTE Before Controls (TPY)	PTE After Controls and Limits (TPY)
PM	173.45	1.75
PM10	173.45	1.75
SO_2	0.00	0.00
VOC	3.91	3.91
CO	0.00	0.00
NO_x	0.00	0.00

HAPs	PTE Before Controls (TPY)	PTE After Controls and Limits (TPY)
Xylene	0.03	0.03
Cumene	0.01	0.01
Toluene	0.02	0.02
Ethylbenzene	0.00	0.00
Triethylamine (TEA)	0.43	0.43
Butoxyethoxyethanol (GEC)	0.01	0.01
TOTAL	**0.50**	**0.50**

The source modification is subject to 326 IAC 2-7-10.5(d)(4)(C), which states that "modifications for which the potential to emit is limited to less than twenty-five (25) tons per year of any regulated pollutant other than hazardous air pollutants, ten (10) tons per year of any single hazardous air pollutant as defined under Section 112(b) of the CAA, or twenty-five (25) tons per year of any combination of hazardous air pollutants must comply with one (1) of the following constraints:"

326 IAC 2-7-10.5(d)(4)(C) Using a particulate air pollution control device as follows:
- (i) Achieving and maintaining ninety-nine percent (99%) efficiency.
- (ii) Complying with a no visible emission standard.
- (iii) The potential to emit before controls does not exceed major source thresholds for federal permitting programs.
- (iv) Certifying to the commissioner that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM_{10}).

The permittee has provided a certification that the control device supplier guarantees 99% control efficiency for the dust collector filter cartridges. 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 the modification involves significant changes to existing monitoring Part 70 permit terms or conditions and reporting or record keeping permit terms or conditions.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units.

	Potential to Emit (TPY)					
Process/Emission Unit	**PM**	**PM10**	**SO_2**	**VOC**	**CO**	**NO_X**
UV-1,2 (30 Sheen UV RC T/C)	0.00	0.00	0.00	0.46	0.00	0.00
UV-1,2 (W/W Rollercoat UV Sealer)	0.00	0.00	0.00	0.54	0.00	0.00
UV-3,4 (70 Sheen W/B Spray UV T/C)	0.00	0.00	0.00	1.42	0.00	0.00
UV-3,4 (50 Sheen W/B Spray UV T/C)	0.00	0.00	0.00	1.49	0.00	0.00
Sanding/Scuffing Operations	1.75	1.75	0.00	0.00	0.00	0.00
Total for Modification	**1.75**	**1.75**	**0.00**	**3.91**	**0.00**	**0.00**
Total for Source Prior to Modification	**249.00**	**249.00**	**0.00**	**246.00**	**0.00**	**0.00**
Total for Source After Modification	**249.00**	**249.00**	**0.00**	**246.00**	**0.00**	**0.00**
Major Source Threshold	**< 250**	**< 250**	**< 250**	**< 250**	**< 250**	**< 250**

(1) Any control equipment is considered federally enforceable only after issuance of this Part 70 minor source modification and significant permit modification and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

(a) The potential to emit PM and PM_{10} for the sanding/scuffing operations is based on 99% control efficiency of the dust collector filter cartridges.

(b) The potential to emit PM and PM_{10} for UV-3 is based on 99% control efficiency of the dry filter associated with this emission unit.

(2) This modification to an existing minor stationary source is not major, under PSD (326 IAC 2-2), because the emissions increase for each regulated pollutant is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(3) After this modification, the source is not a major stationary source, under PSD (326 IAC 2-2), because each regulated pollutant is limited to less than 250 tons per year.

(a) The potential to emit PM and PM_{10} emissions for the modification is included in the source's potential to emit PM and PM_{10} limit of less than 250 tons per year.

(b) The potential to emit VOC emissions for the modification is included in the source's potential to emit VOC limit of less than 250 tons per year.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to the proposed addition of the UV waterbased wood coating process:

(a) There are no New Source Performance Standards (NSPS), 326 IAC 12 and 40 CFR Part 60, applicable to this proposed modification.

(b) The UV waterbased wood coating process is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14. Nonapplicable portions of the NESHAP will not be included in the permit. The Permittee shall comply with the requirements of this condition upon startup.

(c) Pursuant to 40 CFR 63, Subpart JJ, the UV waterbased wood coating process shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows (40 CFR 63.802(a)(1)):

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; 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 from contact adhesives as follows (40 CFR 63.802(a)(2)):

(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, as applied; or

(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, as applied; or

(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, as applied (40 CFR 63.802(a)(3)).

(4) The source shall complete a work practice implementation plan within sixty (60) calendar days after the compliance date as specified in 40 CFR 63.803(a). The plan must detail how the source will incorporate environmentally desirable practices into the process.

(5) A semi-annual summary report shall be prepared and submitted to IDEM, OAQ to document the ongoing compliance status of the UV waterbased wood coating process, as specified in 40 CFR 63.807(c).

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

(e) 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 controls equal to or greater than the major source threshold for the pollutant involved; and

(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 criteria under 40 CFR 64.1 to each new or modified emission unit involved:

Emission Units	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (TPY) PM & PM_{10}	Controlled PTE (TPY) PM & PM_{10}	Major Source Threshold for PM & PM_{10} (TPY)	CAM Applicable (Y/N)	Large Unit (Y/N)
UV-1, UV-2, UV-3 & UV-4	UV-DC1	Y	173.45	1.75	100	Y	N

Based on this evaluation of the requirements of 40 CFR Part 64, CAM is applicable to the emission units UV-1, UV-2, UV-3 and UV-4 for PM and PM_{10} upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the application for the Title V Renewal.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)
This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. PSD and Emission Offset applicability is discussed under the Permit Level Determination - PSD and Emission Offset section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs))
The UV waterbased wood coating process will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the flat spray coating line, identified as UV-3, shall be controlled by a dry particulate filter, and the Permittee shall operate the filter in accordance with manufacturer's specifications.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the seven (7) sanding/scuffing operations associated with the UV waterbased wood coating process shall not exceed 40.00 pounds per hour when operating at a process weight rate of 30 tons per hour.

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

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

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

In order to comply with this limitation, the dust collector (UV-DC1) shall be in operation at all times

the UV waterbased wood coating process is in operation.

326 IAC 8-1-6 (New facilities; general reduction requirements)
The UV waterbased wood coating process is not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because it is subject to 326 IAC 8-2-12.

326 IAC 8-2-12 (Volatile Organic Compounds (VOCs))
Pursuant to 326 IAC 8-2-12 (Wood furniture and cabinet coating), each of the four coating lines UV-1, UV-2, UV-3 and UV-4, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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.

Since UV-1, UV-2 and UV-4 use roller coating and UV-3 uses HVLP guns, the surface coating operations are in compliance with 326 IAC 8-2-12.

Compliance Determination and Monitoring Requirements

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

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

The compliance monitoring requirements applicable to the UV waterbased wood coating process are as follows:

(1) The UV waterbased wood coating process has applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for spray coating line UV-3. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating line stack UV3-B1, while UV-3 is in operation. If a condition

exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from UV-3 surface coating line stack UV3-B1, and of the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(c) Visible emissions from the dust collector shall be observed daily and normal or abnormal emissions shall be recorded. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

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

These monitoring conditions are necessary because the dry filter and dust collector must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 147-6474-00044. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. Section A.2 has been revised to incorporate the new process.

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:

…

One (1) UV waterbased wood coating process, approved for construction in 2007, consisting of four (4) coating lines, seven (7) sanding/scuffing operations and two (2) electric ovens identified as follows:

(1) One (1) edge roll coating line, identified as UV-1, with a maximum capacity of 80 ft/min, with uncontrolled emissions exhausting to stacks A1 and A2;

(2) One (1) standard flat roll coating line, identified as UV-2, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A3, A4, A5, A6-A, A6-B and A6-C;

(3) One (1) enclosed flat spray coating line, identified as UV-3, with a maximum capacity of 20 ft/min, exhausting to stacks A7-A, A7-B, A8, A9 and A10, with overspray controlled by dry filters, exhausting to B1;

(4) One (1) special product coating line, identified as UV-4, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A11, A12-A and A12-B;

(5) Seven (7) sanding/scuffing operations, identified as UVD1, UVD2, UVD3, UVD4, UVD5, UVD6 and UVD7, with particulate emissions controlled by a dust collector with a total maximum capacity of 40 lb/hr, identified as UV-DC1; and

(6) Two (2) electric ovens.

…

2. Section D.5 has been modified to incorporate the applicable requirements for the new process.

SECTION D.5 FACILITY OPERATION CONDITIONS

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

One (1) UV waterbased wood coating process, subject to the provisions of 40 CFR 63, Subpart JJ, the Wood Furniture Manufacturing Operations National Emission Standards for Hazardous Air Pollutants (NESHAP), approved for construction in 2007, consisting of four (4) coating lines, seven (7) sanding/scuffing operations, and two (2) electric ovens, identified as follows:

(1) One (1) edge roll coating line, identified as UV-1, with a maximum capacity of 80 ft/min, with uncontrolled emissions exhausting to stacks A1 and A2;

(2) One (1) standard flat roll coating line, identified as UV-2, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A3, A4, A5, A6-A, A6-B and A6-C;

(3) One (1) enclosed flat spray coating line, identified as UV-3, with a maximum capacity of 20 ft/min, exhausting to stacks A7-A, A7-B, A8, A9 and A10, with overspray controlled by dry filters, exhausting to stack B1;

(4) One (1) special product coating line, identified as UV-4, with a maximum capacity of 30 ft/min, with uncontrolled emissions exhausting to stacks A11, A12-A and A12-B;

(5) Seven (7) sanding/scuffing operations, identified as UVD1, UVD2, UVD3, UVD4, UVD5, UVD6 and UVD7, with particulate emissions controlled by a dust collector with a total maximum capacity of 40 lb/hr, identified as UV-DC1; and

(6) Two (2) electric ovens.

(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.5.1 PSD Minor Limit [326 IAC 2-2]

The entire source shall use less than 250 tons of VOC, including coatings and dilution solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.5.3 Minor Source Modification Limits [326 IAC 2-7-10.5(d)(4)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(4)(C), particulate matter (PM) from the dust collector (UV-DC1), used to control PM from the UV waterbased wood coating process, shall be limited to less than twenty-five (25) tons per year and shall comply with the following limits:

(a) Operate with a control efficiency of at least ninety-nine percent (99%);
(b) Have no visible emissions; and
(c) Limit PM emissions from the dust collector (UV-DC1) to less than 5.71 lb/hr and PM_{10} to less than 3.42 lb/hr. Compliance with these limits shall result in actual emissions less than twenty-five (25) tons per year of PM or fifteen (15) tons per year of PM_{10}.

D.5.4 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the flat spray coating line, UV-3, shall be controlled by a dry filter, and the Permittee shall operate the filter in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the seven (7) sanding/scuffing operations associated with the UV waterbased wood coating process shall not exceed 40.00 pounds per hour when operating at a process weight rate of 30 tons per hour.

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

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

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

D.5.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets from each of the four coating lines, UV-1, UV-2, UV-3 and UV-4, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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.5.6 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.5.7 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

(a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 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, as applied; 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 any combination of (A), (B) and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) Use compliant contact adhesives as follows:

(i) 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;

(ii) 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;

or

(B) 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, as applied.

D.5.8 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). 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.5.9 Compliance Assurance Monitoring (CAM) Plan [40 CFR 64]

A Compliance Assurance Monitoring (CAM) Plan, in accordance with 40 CFR 64, is required for the emission units UV-1, UV-2, UV-3 and UV-4 because the potential to emit particulate matter before controls is greater than one hundred (100) tons per year and is subject to an emission limitation. The requirements of CAM, 40 CFR Part 64, are applicable to the emission units UV-1, UV-2, UV-3 and UV-4 for particulate matter upon issuance of the Title V Renewal. A revised CAM plan must be submitted as part of the application for Title V Renewal.

Compliance Determination Requirements

D.5.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

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.5.11 Operator Training for PM Control

(a) The Permittee shall implement an operator-training program:

(1) All operators of spray coating line shall be trained in the proper setup and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection, maintenance and trouble shooting practices. The training program shall be written and

retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.

(3) All operators shall be given refresher training annually.

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

D.5.12 Particulate [326 IAC 6-3-2]

(a) In order to comply with Condition D.5.4(a), the dry filters for particulate matter (PM) overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the spray coating line is in operation.

(b) In order to comply with Condition D.5.4(b), the dust collector for particulate control shall be in operation and control emissions from the UV waterbased wood coating process at all times the UV waterbased wood coating process is in operation.

(c) In the event that failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.5.13 VOC and VHAP Limitations [326 IAC 8-1-2] [326 IAC 8-1-4] [40 CFR 63.804 and 63.805]

Compliance with the VOC and VHAP limitations contained in Conditions D.5.1 and D.5.7 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.

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

D.5.14 Visible Emissions Notations

(a) Visible emissions shall be observed daily and performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Corrective Actions and Response Steps.

Failure to take response steps in accordance with Section C – Corrective Actions and Response Steps, shall be considered a deviation from this permit.

D.5.15 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for spray coating line UV-3. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating line stack UV3-B1, while UV-3 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from UV-3 surface coating line stack UV3-B1, and of the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.5.16 Broken or Failed Dust Collector

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

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

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

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

D.5.17 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VOC emission limit and VOC emission determination requirements established in Condition D.5.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include:

(A) Purchase orders, invoices, and any other tracking records necessary to verify the amount of each product received onsite and any shipped offsite, and the amount of each product dispensed from

inventory to the coating area and any returned to inventory from the coating area, and

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material used shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.

(2) The amount of VOC drummed and shipped offsite each month for disposal as waste, if the waste VOC is deducted from the total reported VOC usage. Records shall include:

(A) The amount and VOC content of each used coating material and solvent collected for disposal offsite. Records shall include Hazardous Waste Reclamation Record sheets, or equivalent, with an entry made each time additional material is placed in a waste collection drum. Each entry shall note the complete product name or product number of the material and the quantity of material placed in the drum.

(B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material placed in the drum.

(3) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.5.7, 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.5.7.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP 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 spray booth 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.5.11, the Permittee shall maintain a copy of the operator-training program and training records.

(d) To document compliance with Conditions D.5.4(a) and D.5.14, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

(e) To document compliance with Condition D.5.14, the Permittee shall maintain daily records of the visible emission notations of the dust collector. The Permittee shall include in its daily record when a visible emission notation is not taken and the

reason for the lack of a visible emission notation, (e.g. the process did not operate that day).

D.5.18 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.1 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 147-25154-00044 and Significant Permit Modification No. 147-25156-00044. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

Appendix A

Emission Calculations

Company Name: National Office Furniture (N.O.F.) - Santa Claus
Plant Location 1255 West Christmas Boulevard, Santa Claus, Indiana 47579
County: Spencer
Permit Reviewer: Joe Sachse
Permit #: T147-6474-00044
MSM #: 147-25154-00044
SPM #: 147-25156-00044

UV Process using Akzo Nobel Coatings

Unit ID	Product Number	Max. gal/hr	density lb/gal	VOC wt %	Exempt wt %	HAPs wt %	Solids wt %	* Control Efficiency	VOC lb/hr	VOC TPY	HAPs lb/hr	HAPs TPY	PM lb/hr	PM TPY	
UV-1, UV-2	972-30C5W-1033	0.81	9.28	1.39	0	0.029	99.38	0	0.10	0.46	0.00	0.01	0.00	0.00	
UV-1, UV-2	972-C5W-1007	1.13	9.46	1.16	0	0.099	98.71	0	0.12	0.54	0.01	0.05	0.00	0.00	
UV-3, UV-4	680-70L5W-621	0.75	8.71	4.96	64.58	0.778	33.45	99	0.32	1.42	0.05	0.22	0.00	0.00	
UV-3, UV-4	680-70L5W-627	0.75	8.73	5.19	61.16	0.758	33.65	99	0.34	1.49	0.05	0.22	0.00	0.00	
									0.89	3.91	0.11	0.50	0.00	0.00	**TOTAL**

Individual Hazardous Air Pollutants

Unit ID	Product Number	Max. gal/hr	density lb/gal	Xylene wt %	Xylene lb/hr	Cumene wt %	Cumene lb/hr	Toluene wt %	Toluene lb/hr	Ethyl Benzene wt %	Ethyl Benzene lb/hr	Triethyl amine (TEA) wt %	Triethyl amine (TEA) lb/hr	Butoxy ethoxy ethanol (GEC) wt %	Butoxy ethoxy ethanol (GEC) lb/hr
UV-1, UV-2	972-30C5W-1033	0.81	9.28	0.02	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
UV-1, UV-2	972-C5W-1007	1.13	9.46	0.05	0.01	0.01	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00
UV-3, UV-4	680-70L5W-621	0.75	8.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	0.05	0.02	0.00
UV-3, UV-4	680-70L5W-627	0.75	8.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	0.05	0.01	0.00
				lb/hr	0.01	**lb/hr**	0.00	**lb/hr**	0.00	**lb/hr**	0.00	**lb/hr**	0.10	**lb/hr**	0.00
				TPY	0.03	**TPY**	0.01	**TPY**	0.02	**TPY**	0.00	**TPY**	0.43	**TPY**	0.01

Dust Collector: Controls Sanding/Scuffing Operations from UV-1, UV-2, UV-3 and UV-4

Unit ID	Unit Name	Max. Use lb/hr	* Control Efficiency	PTE PM Captured lb/hr	PTE PM Emitted lb/hr	PTE PM Captured lb/yr	PTE PM Emitted lb/yr	PTE PM Captured TPY	PTE PM Emitted TPY
UV-DC1	Torit DFO 360	40	99.00%	39.60	0.40	346,896	3,504.00	173.45	1.75

* Note: Control efficiency used is 99% to verify compliance with 326 IAC 2-7-10.5(d)(4)(C).
N.O.F. indicated that the dust collector has an overall control efficienacy of 99.99%.