



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 28, 2014

TO: Marion Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Hartson-Kennedy Cabinet Top Company, Inc.
Permit Number: 053-30261-00032

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Hartson-Kennedy Cabinet Top Company, Inc.
522 West 22nd Street
Marion, Indiana 46953**

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

Operation Permit No.: T 053-30261-00032	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 28, 2014 Expiration Date: July 28, 2019



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**Attachment A: NESHAP Subpart JJ - National Emission Standards for Wood Furniture
Manufacturing Operations**

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(14)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary cabinet top manufacturing source.

Source Address:	522 West 22 nd Street, Marion, Indiana 46953
General Source Phone Number:	765 - 668 - 8144
SIC Code:	2541
County Location:	Grant
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

- (a) Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, and each approved in 2014 for modification, each equipped with airless spray applicators and dry filters for overspray control.
 - (1) One (1) adhesive spray booth for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.
 - (2) One (1) adhesive spray booth for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.
 - (3) One (1) adhesive spray booth for Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.
- (b) One (1) adhesive spray booth for Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 and 2014 for modification, with a total capacity of 37.5 parts per hour and exhausting through Stack 6.
- (c) Four (4) woodworking operations, collectively identified as EU-2, equipped with an integral cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) woodworking operations is associated with each of the following lines:
 - (1) The Main Line (Line 1), installed in 1976.
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.

- (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.
- (4) The Etop Line (Line 4) installed in 1976.
- (d) Four (4) wash areas, collectively identified as EU-3, each with a capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) wash area is associated with each of the following lines:
 - (1) The Main Line (Line 1), installed in 1976.
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.
 - (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.
 - (4) The Etop Line (Line 4) installed in 1976.
- (e) One (1) custom area for thinner washoff operations, identified as EU-4, installed in 1976 and modified in 2002, capacity: 315 linear feet of wood cabinet tops per hour, total.
- (f) Cutting and grinding operations (Solid Surface Line) equipped with an integral AGET cyclone and baghouse system, identified as CE-2, installed in 2000, exhausting indoors, capacity: 30 pounds of countertops per hour.

This plant is considered an existing affected source under 40 CFR 63, Subpart JJ.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour rated at a total of 1.495 million British thermal units per hour, consisting of twenty-three (23) furnaces for building heat, rated 0.065 million British thermal units per hour, each.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.
- (d) One (1) adhesive roll coating booth identified as Flat Panel, identified as EU-5, installed in 2002, capacity: 1,280 pounds of particle board per hour and 98 pounds of laminate per hour. This unit is considered a new affected source under 40 CFR 63, Subpart JJ.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5] [326 IAC 8-3-2]

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

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

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

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)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T053-30261-00032, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(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 Provide Information [326 IAC 2-7-5(6)(E)]

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement 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, 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 the compliance status 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 the Permittee's 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (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 is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of

326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) 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) 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.

B.12 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 for 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) 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.
- (c) 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.

- (d) 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.
- (e) 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).
- (f) 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)]
- (g) 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)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T053-30261-00032 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.18 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 or notice 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) 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.19 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) or (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permit Administration and Support 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, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (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(37)) 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 is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or

not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.12 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]
[326 IAC 2-7-6]

- (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:
 - (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
 - (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
 - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
 - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
 - (e) The Permittee shall record the reasonable response steps taken.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return

operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 - (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
 - (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
 - (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
 - (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
 - (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

- (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
- (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.16 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]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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(33) ("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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1(kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

C.19 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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating Operations

- (a) Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, and each approved in 2014 for modification, each equipped with airless spray applicators and dry filters for overspray control.
- (1) One (1) adhesive spray booth for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.
- (2) One (1) adhesive spray booth for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.
- (3) One (1) adhesive spray booth for Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.
- (b) One (1) adhesive spray booth for Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 and 2014 for modification, with a total capacity of 37.5 parts per hour and exhausting through Stack 6.
- (e) One (1) custom area for thinner washoff operations, identified as EU-4, installed in 1976 and modified in 2002, capacity: 315 linear feet of wood cabinet tops per hour, total.

These units are considered existing affected sources under 40 CFR 63, Subpart JJ

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

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) adhesive spray booths, collectively identified as EU-1, and Line 3, identified as EU-6, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied by Duraform/Diamond Cut Line (Line 3), identified as EU-6, to wood furniture and cabinets shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between

one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.4 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the adhesive spray booth Stacks 1, 2, 3 and 4 while the associated booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its daily, weekly, and monthly records when an inspection or observation is not taken and the reason for the lack of inspection or observation (e.g. the process did not operate for that time period).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking Operations

(c) Four (4) woodworking operations, collectively identified as EU-2, equipped with an integral cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) woodworking operations is associated with each of the following lines:

- (1) The Main Line (Line 1), installed in 1976.
- (2) The Bar/Vanity Line (Line 2), installed in 1976.
- (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.
- (4) The Etop Line (Line 4) installed in 1976.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the four (4) woodworking operations, (Main Line (Line 1), Etop (Line 4), Bar/Vanity (Line 2), Duraform/Diamond Cut (Line 3)), collectively identified as EU-2, shall not exceed 14.9 pounds per hour when operating at a process weight rate of 13,780 pounds per hour.

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the woodworking operations and CE-1, the cyclone and baghouse system. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to ensure compliance with Condition D.2.1, the baghouse and cyclone for particulate control shall be in operation and control emissions from the four (4) woodworking operations, (Main Line (Line 1), Etop (Line 4), Bar/ Vanity (Line 2), and Duraform/Diamond Cut (Line 3)), collectively identified as EU-2, at all times that any of the woodworking processes are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Visible Emissions Notations [40 CFR 64, Compliance Assurance Monitoring (CAM)]

- (a) Visible emission notations of the woodworking operations exhaust, Stack 5, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Baghouse Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

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

D.2.6 Broken or Failed Bag Detection

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

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

D.2.7 Cyclone Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

An inspection shall be performed each calendar quarter of all cyclones controlling woodworking operations.

D.2.8 Cyclone Failure Detection

- (a) For a cyclone 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 cyclone 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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking operations exhaust, Stack 5. 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).
- (b) To document the compliance status with Conditions D.2.5 and D.2.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.7.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Cutting and Grinding Operations

- (f) Cutting and grinding operations (Solid Surface Line) equipped with an integral AGET cyclone and baghouse system, identified as CE-2, installed in 2000, exhausting indoors, capacity: 30 pounds of countertops per hour.

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

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

D.3.1 Particulate [326 IAC 6-3-2]

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

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the cutting and grinding operations (Solid Surface Line) and CE-2, the AGET cyclone and baghouse system. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.3 Particulate Control

- (a) In order to ensure the Solid Surface Line is exempt from the requirements of 326 IAC 6-3-2, the AGET cyclone and baghouse system for particulate control shall be in operation and control emissions from the cutting and grinding operations (Solid Surface Line) at all times these processes are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.3.4 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with

abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.3.5 Cyclone Failure Detection

- (a) For a cyclone 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 cyclone 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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

SECTION E.1

NESHAP

Emissions Unit Description:

- (a) Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, and each approved in 2014 for modification, each equipped with airless spray applicators and dry filters for overspray control.
 - (1) One (1) adhesive spray booth for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.
 - (2) One (1) adhesive spray booth for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.
 - (3) One (1) adhesive spray booth for Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.
- (b) One (1) adhesive spray booth for Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 and 2014 for modification, with a total capacity of 37.5 parts per hour and exhausting through Stack 6.
- (c) Four (4) woodworking operations, collectively identified as EU-2, equipped with an integral cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) woodworking operations is associated with each of the following lines:
 - (1) The Main Line (Line 1), installed in 1976.
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.
 - (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.
 - (4) The Etop Line (Line 4) installed in 1976.

Insignificant Activity:

- (d) One (1) adhesive roll coating booth identified as Flat Panel, identified as EU-5, installed in 2002, capacity: 1,280 pounds of particle board per hour and 98 pounds of laminate per hour. This unit is considered a new affected source under 40 CFR 63, Subpart JJ.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)] [326 IAC 2-8-4 (1)] [326 IAC 2-6.1-5 (a)]

E.1.1 General Provisions Relating to NESHAP JJ [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.800(e), the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart JJ, in accordance with the schedule in 40 CFR Part 63, Subpart JJ.

E.1.2 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations [326 IAC 20-14] [40 CFR Part 63, Subpart JJ]

Pursuant to 40 CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ, which are incorporated by reference as 326 IAC 20-14 (included as Attachment A to this permit), for the above listed emissions units, as specified as follows.

- (1) 40 CFR 63.800(a), (d), (e), (f), (g)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a)(2)(ii), (a)(3), (a)(4)(ii)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (c)(1), (f)(5), (f)(7), (f)(8), (g)(5), (g)(7), (g)(8), (g)(9), (h)(3)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806 (a), (b), (e), (h), (i), (j), (k)
- (8) 40 CFR 63.807 (a), (b), (c), (e)
- (9) Tables 1, 2, 3, 4, 5, and 6 to Subpart JJ of Part 63

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Hartson-Kennedy Cabinet Top Company, Inc.
Source Address: 522 West 22nd Street, Marion, Indiana 46953
Part 70 Permit No.: T 053-30261-00032

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

COMPLIANCE AND ENFORCEMENT 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: Hartson-Kennedy Cabinet Top Company, Inc.
Source Address: 522 West 22nd Street, Marion, Indiana 46953
Part 70 Permit No.: T 053-30261-00032

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Hartson-Kennedy Cabinet Top Company, Inc.
Source Address: 522 West 22nd Street, Marion, Indiana 46953
Part 70 Permit No.: T 053-30261-00032

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attachment A to Part 70 Operating Permit Renewal No. T053-30261-00032

[Downloaded from the eCFR on September 10, 2013]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

40 CFR 63, Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations

Source: 60 FR 62936, Dec. 7, 1995, unless otherwise noted.

§ 63.800 Applicability.

(a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, § 63.2. The owner or operator of a source that meets the definition for an incidental wood furniture manufacturer shall maintain purchase or usage records demonstrating that the source meets the definition in § 63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.

(b) A source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to any other provision of this rule, provided that: In the case of paragraphs (b)(1) and (b)(2), finishing materials, adhesives, cleaning solvents and washoff solvents used for wood furniture or wood furniture component manufacturing operations account for at least 90 percent of annual HAP emissions at the plant site, and if the plant site has HAP emissions that do not originate from the listed materials, the owner or operator shall keep any records necessary to demonstrate that the 90 percent criterion is being met. A source that initially relies on the limits and criteria specified in paragraphs (b)(1), (b)(2), and (b)(3) to become an area source, but subsequently exceeds the relevant limit (without first obtaining and complying with other limits that keep its potential to emit hazardous air pollutants below major source levels), becomes a major source and must comply thereafter with all applicable provisions of this subpart starting on the applicable compliance date in § 63.800. Nothing in this paragraph (b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

(1) The owner or operator of the source uses no more than 250 gallons per month, for every month, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). The owner or operator shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month, and upon request submit such records to the Administrator. These records shall be maintained for five years.

(2) The owner or operator of the source uses no more than 3,000 gallons per rolling 12-month period, for every 12-month period, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). A rolling 12-month period includes the previous 12 months of operation. The owner or operator of the source shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month and the total gallons used each previous month, and upon request submit such records to the Administrator. Because records are needed over the previous set of 12 months, the owner or operator shall keep monthly records beginning no less than one year before the compliance date specified in § 63.800(e). Records shall be maintained for five years.

(3) The source emits no more than 4.5 Mg (5 tons) of any one HAP per rolling 12-month period and no more than 11.4 Mg (12.5 tons) of any combination of HAP per rolling 12-month period, and at least 90 percent of the plantwide

emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture components.

(c) This subpart does not apply to research or laboratory facilities as defined in § 63.801.

(d) This subpart does not apply to any surface coating or coating operation that meets any of the criteria of paragraphs (d)(1) through (4) of this section.

(1) Surface coating of metal parts and products other than metal components of wood furniture that meets the applicability criteria for miscellaneous metal parts and products surface coating (subpart MMMM of this part).

(2) Surface coating of plastic parts and products other than plastic components of wood furniture that meets the applicability criteria for plastic parts and products surface coating (subpart PPPP of this part).

(3) Surface coating of wood building products that meets the applicability criteria for wood building products surface coating (subpart QQQQ of this part). The surface coating of millwork and trim associated with cabinet manufacturing are subject to subpart JJ.

(4) Surface coating of metal furniture that meets the applicability criteria for metal furniture surface coating (subpart RRRR of this part). Surface coating of metal components of wood furniture performed at a wood furniture or wood furniture component manufacturing facility are subject to subpart JJ.

(e) Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.

(f) The compliance date for existing affected sources that emit less than 50 tons per year of HAP in 1996 is December 7, 1998. The compliance date for existing affected sources that emit 50 tons or more of hazardous air pollutants in 1996 is November 21, 1997. The owner or operator of an existing area source that increases its emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart shall comply with this subpart one year after becoming a major source.

(g) Existing affected sources shall be in compliance with § 63.802(a)(4) and § 63.803(h) no later than November 21, 2014. The owner or operator of an existing area source that increases its emissions of (or its potential to emit) hazardous air pollutants (HAP) such that the source becomes a major source that is subject to this subpart shall comply with this subpart 1 year after becoming a major source.

(h) New affected sources must comply with the provisions of this standard immediately upon startup or by December 7, 1995, whichever is later. New area sources that become major sources shall comply with the provisions of this standard immediately upon becoming a major source.

(i) Reconstructed affected sources are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment (e.g., incinerators, carbon adsorbers, etc.) are not considered in determining whether the facility has been reconstructed, unless the control equipment is required as part of the process (e.g., product recovery). Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs. For example, an affected source may convert to waterborne coatings to meet the requirements of this subpart. At most facilities, this conversion will require the replacement of existing storage tanks, mix equipment, and transfer lines. The cost of replacing the equipment is not considered in determining whether the facility has been reconstructed.

(j) If the owner or operator, in accordance with 40 CFR 63.804, uses a control system as a means of limiting emissions, in response to an action to enforce the standards set forth in this subpart, you may assert an affirmative defense to a claim for civil penalties for exceedances of such standards that are caused by malfunction, as defined in 40 CFR 63.2. Appropriate penalties may be assessed, however, if the respondent fails to meet its burden of proving all the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

(1) To establish the affirmative defense in any action to enforce such a limit, the owner or operator must timely meet the notification requirements in paragraph (j)(2) of this section, and must prove by a preponderance of evidence that:

(i) The excess emissions:

(A) Were caused by a sudden, infrequent, and unavoidable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner; and

(B) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and

(C) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(D) Were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(ii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and

(iii) The frequency, amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions; and

(iv) If the excess emissions resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and

(v) All possible steps were taken to minimize the impact of the excess emissions on ambient air quality, the environment, and human health; and

(vi) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and

(vii) All of the actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs; and

(viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions; and

(ix) A written root cause analysis has been prepared, the purpose of which is to determine, correct and eliminate the primary causes of the malfunction and the excess emissions resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of excess emissions that were the result of the malfunction.

(2) *Notification.* The owner or operator of the facility experiencing an exceedance of its emission limit(s) during a malfunction shall notify the Administrator by telephone or facsimile (FAX) transmission as soon as possible, but no later than 2 business days after the initial occurrence of the malfunction, if it wishes to avail itself of an affirmative defense to civil penalties for that malfunction. The owner or operator seeking to assert an affirmative defense shall also submit a written report to the Administrator within 45 days of the initial occurrence of the exceedance of the standard in this subpart to demonstrate, with all necessary supporting documentation, that it has met the requirements set forth in paragraph (h)(1) of this section. The owner or operator may seek an extension of this deadline for up to 30 additional days by submitting a written request to the Administrator before the expiration of the 45 day period. Until a request for an extension has been approved by the Administrator, the owner or operator is subject to the requirement to submit such report within 45 days of the initial occurrence of the exceedance.

§ 63.801 Definitions.

(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A (General Provisions) of this part.

Adhesive means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. Under this subpart, adhesives shall not be considered coatings or finishing materials. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Administrator means the Administrator of the United States Environmental Protection Agency or his or her authorized representative.

Aerosol adhesive means an adhesive that is dispensed from a pressurized container as a suspension of fine solid or liquid particles in gas.

Affected source means a wood furniture manufacturing facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2, excluding sources that meet the criteria established in § 63.800(a), (b) and (c) of this subpart.

Affirmative defense means, in the context of an enforcement proceeding, a response or defense put forward by a defendant, regarding which the defendant has the burden of proof and the merits of which are independently and objectively evaluated in a judicial or administrative proceeding.

Alternative method means any method of sampling and analyzing for an air pollutant that is not a reference or equivalent method but has been demonstrated to the Administrator's satisfaction to, in specific cases, produce results adequate for a determination of compliance.

As applied means the HAP and solids content of the coating or contact adhesive that is actually used for coating or gluing the substrate. It includes the contribution of materials used for in-house dilution of the coating or contact adhesive.

Basecoat means a coat of colored material, usually opaque, that is applied before graining inks, glazing coats, or other opaque finishing materials, and is usually topcoated for protection.

Baseline conditions means the conditions that exist prior to an affected source implementing controls, such as a control system.

Building enclosure means a building housing a process that meets the requirements of a temporary total enclosure. The EPA Method 204E is used to identify all emission points from the building enclosure and to determine which emission points must be tested. For additional information see *Guidelines for Determining Capture Efficiency*, January 1994. Docket No. A-93-10, Item No. IV-B-1.

Capture device means a hood, enclosed room, floor sweep, or other means of collecting solvent emissions or other pollutants into a duct so that the pollutant can be directed to a pollution control device such as an incinerator or carbon adsorber.

Capture efficiency means the fraction of all organic vapors generated by a process that are directed to a control device.

Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

(1) The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311 (as promulgated in this subpart), or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in § 63.805(a));

(2) The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in § 63.805 (a)); and

(3) The density, measured by EPA Method 24 or an alternative or equivalent method. Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the affected source in demonstrating compliance with the emission limitations presented in § 63.802.

NOTE: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.)

Cleaning operations means operations in which organic HAP solvent is used to remove coating materials or adhesives from equipment used in wood furniture manufacturing operations.

Coating means a protective, decorative, or functional film applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, enamels, inks, and temporary protective coatings. Aerosol spray paints used for touch-up and repair are not considered coatings under this subpart.

Coating application station means the part of a coating operation where the coating is applied, e.g., a spray booth.

Coating operation means those activities in which a coating is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

Coating solids (or solids) means the part of the coating which remains after the coating is dried or cured; solids content is determined using data from the EPA Method 24, or an equivalent or alternative method.

Compliant coating/contact adhesive means a finishing material, contact adhesive, or strippable booth coating that meets the emission limits specified in Table 3 of this subpart.

Contact adhesive means an adhesive that is applied to two substrates, dried, and mated under only enough pressure to result in good contact. The bond is immediate and sufficiently strong to hold pieces together without further clamping, pressure, or airing.

Continuous coater means a finishing system that continuously applies finishing materials onto furniture parts moving along a conveyor. Finishing materials that are not transferred to the part are recycled to a reservoir. Several types of application methods can be used with a continuous coater including spraying, curtain coating, roll coating, dip coating, and flow coating.

Continuous compliance means that the affected source is meeting the emission limitations and other requirements of the rule at all times and is fulfilling all monitoring and recordkeeping provisions of the rule in order to demonstrate compliance.

Control device means any equipment that reduces the quantity of a pollutant that is emitted to the air. The device may destroy or secure the pollutant for subsequent recovery. Includes, but is not limited to, incinerators, carbon adsorbers, and condensers.

Control device efficiency means the ratio of the pollutant released by a control device and the pollutant introduced to the control device.

Control system means the combination of capture and control devices used to reduce emissions to the atmosphere.

Conventional air spray means a spray coating method in which the coating is atomized by mixing it with compressed air and applied at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization. Airless and air assisted airless spray technologies are not conventional air spray because the coating is not atomized by mixing it with compressed air. Electrostatic spray technology is also not considered conventional air spray because an electrostatic charge is employed to attract the coating to the workpiece.

Data quality objective (DQO) approach means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Day means a period of 24 consecutive hours beginning at midnight local time, or beginning at a time consistent with a facility's operating schedule.

Disposed offsite means sending used organic HAP solvent or coatings outside of the facility boundaries for disposal.

Emission means the release or discharge, whether directly or indirectly, of HAP into the ambient air.

Enamel means a coat of colored material, usually opaque, that is applied as a protective topcoat over a basecoat, primer, or previously applied enamel coats. In some cases, another finishing material may be applied as a topcoat over the enamel.

Equipment leak means emissions of VHAP from pumps, valves, flanges, or other equipment used to transfer or apply coatings, adhesives, or organic HAP solvents.

Equivalent method means any method of sampling and analyzing for an air pollutant that has been demonstrated to the Administrator's satisfaction to have a consistent and quantitatively known relationship to the reference method, under specific conditions.

Finishing material means a coating used in the wood furniture industry. Such materials include, but are not limited to, stains, basecoats, washcoats, enamels, sealers, and topcoats.

Finishing operation means those operations in which a finishing material is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

Foam adhesive means a contact adhesive used for gluing foam to fabric, foam to foam, and fabric to wood.

Gluing operation means those operations in which adhesives are used to join components, for example, to apply a laminate to a wood substrate or foam to fabric.

Incidental wood furniture manufacturer means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components.

Incinerator means, for the purposes of this industry, an enclosed combustion device that thermally oxidizes volatile organic compounds to CO and CO₂. This term does not include devices that burn municipal or hazardous waste material.

Janitorial maintenance means the upkeep of equipment or building structures that is not directly related to the manufacturing process, for example, cleaning of restroom facilities.

Low-formaldehyde means, in the context of a coating or contact adhesive, a product concentration of less than or equal to 1.0 percent formaldehyde by weight, as described in a certified product data sheet for the material.

Lower confidence limit (LCL) approach means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Material safety data sheet (MSDS) means the documentation required for hazardous chemicals by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR part 1910) for a solvent, cleaning material, contact adhesive, coating, or other material that identifies select reportable hazardous ingredients of the material, safety and health considerations, and handling procedures.

Noncompliant coating/contact adhesive means a finishing material, contact adhesive, or strippable booth coating that has a VHAP content (VOC content for the strippable booth coating) greater than the emission limitation presented in Table 3 of this subpart.

Nonporous substrate means a surface that is impermeable to liquids. Examples include metal, rigid plastic, flexible vinyl, and rubber.

Normally closed container means a container that is closed unless an operator is actively engaged in activities such as emptying or filling the container.

Operating parameter value means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limit.

Organic HAP solvent means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film.

Overall control efficiency means the efficiency of a control system, calculated as the product of the capture and control device efficiencies, expressed as a percentage.

Permanent total enclosure means a permanently installed enclosure that completely surrounds a source of emissions such that all emissions are captured and contained for discharge through a control device. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Recycled onsite means the reuse of an organic HAP solvent in a process other than cleaning or washoff.

Reference method means any method of sampling and analyzing for an air pollutant that is published in appendix A of 40 CFR part 60.

Research or laboratory facility means any stationary source whose primary purpose is to conduct research and development to develop new processes and products where such source is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Responsible official has the meaning given to it in 40 CFR part 70, State Operating Permit Programs (Title V permits).

Sealer means a finishing material used to seal the pores of a wood substrate before additional coats of finishing material are applied. Special purpose finishing materials that are used in some finishing systems to optimize aesthetics are not sealers.

Solvent means a liquid used in a coating or contact adhesive to dissolve or disperse constituents and/or to adjust viscosity. It evaporates during drying and does not become a part of the dried film.

Stain means any color coat having a solids content by weight of no more than 8.0 percent that is applied in single or multiple coats directly to the substrate. It includes, but is not limited to, nongrain raising stains, equalizer stains, prestains, sap stains, body stains, no-wipe stains, penetrating stains, and toners.

Storage containers means vessels or tanks, including mix equipment, used to hold finishing, gluing, cleaning, or washoff materials.

Strippable spray booth material means a coating that:

- (1) Is applied to a spray booth wall to provide a protective film to receive over spray during finishing operations;
- (2) That is subsequently peeled off and disposed; and
- (3) By achieving (1) and (2) of this definition reduces or eliminates the need to use organic HAP solvents to clean spray booth walls.

Substrate means the surface onto which a coating or contact adhesive is applied (or into which a coating or contact adhesive is impregnated).

Temporary total enclosure means an enclosure that meets the requirements of § 63.805(e)(1) (i) through (iv) and is not permanent, but constructed only to measure the capture efficiency of pollutants emitted from a given source. Additionally, any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each natural draft opening. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Thinner means a volatile liquid that is used to dilute coatings or contact adhesives (to reduce viscosity, color strength, and solids, or to modify drying conditions).

Topcoat means the last film-building finishing material that is applied in a finishing system.

Touchup and repair means the application of finishing materials to cover minor finishing imperfections.

VHAP means any volatile hazardous air pollutant listed in Table 2 to Subpart JJ.

VHAP of potential concern means any VHAP from the list in table 6 of this subpart.

Volatile organic compound (VOC) means any organic compound which participates in atmospheric photochemical reactions, that is, any organic compound other than those which the Administrator designates as having negligible photochemical reactivity. A VOC may be measured by a reference method, an equivalent method, an alternative method, or by procedures specified under any rule. A reference method, an equivalent method, or an alternative method, however, may also measure nonreactive organic compounds. In such cases, the owner or operator may exclude the nonreactive organic compounds when determining compliance with a standard. For a list of compounds that the Administrator has designated as having negligible photochemical reactivity, refer to 40 CFR part 51.10.

Washcoat means a transparent special purpose finishing material having a solids content by weight of 12.0 percent by weight or less. Washcoats are applied over initial stains to protect, to control color, and to stiffen the wood fibers in order to aid sanding.

Washoff operations means those operations in which organic HAP solvent is used to remove coating from wood furniture or a wood furniture component.

Wood furniture means any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured at any facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components, including, but not limited to, facilities under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.

Wood furniture component means any part that is used in the manufacture of wood furniture. Examples include, but are not limited to, drawer sides, cabinet doors, seat cushions, and laminated tops. However, foam seat cushions manufactured and fabricated at a facility that does not engage in any other wood furniture or wood furniture component manufacturing operation are excluded from this definition.

Wood furniture manufacturing operations means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.

(b) The nomenclature used in this subpart has the following meaning:

- (1) A_k = the area of each natural draft opening (k) in a total enclosure, in square meters.
- (2) C_c = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).
- (3) C_{aj} = the concentration of VHAP in gas stream (j) exiting the control device, in parts per million by volume.
- (4) C_{bi} = the concentration of VHAP in gas stream (i) entering the control device, in parts per million by volume.
- (5) C_{di} = the concentration of VHAP in gas stream (i) entering the control device from the affected source, in parts per million by volume.
- (6) C_{fk} = the concentration of VHAP in uncontrolled gas stream (k) emitted directly to the atmosphere from the affected source, in parts per million by volume.
- (7) E = the emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids (lb VHAP/lb solids).
- (8) F = the control device efficiency, expressed as a fraction.
- (9) FV = the average inward face velocity across all natural draft openings in a total enclosure, in meters per hour.
- (10) G = the VHAP content of a contact adhesive, in kg VHAP/kg solids (lb VHAP/lb solids), as applied.
- (11) M = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).
- (12) N = the capture efficiency, expressed as a fraction.
- (13) Q_{aj} = the volumetric flow rate of gas stream (j) exiting the control device, in dry standard cubic meters per hour.
- (14) Q_{bi} = the volumetric flow rate of gas stream (i) entering the control device, in dry standard cubic meters per hour.
- (15) Q_{di} = the volumetric flow rate of gas stream (i) entering the control device from the emission point, in dry standard cubic meters per hour.
- (16) Q_{fk} = the volumetric flow rate of uncontrolled gas stream (k) emitted directly to the atmosphere from the emission point, in dry standard cubic meters per hour.
- (17) Q_{in_i} = the volumetric flow rate of gas stream (i) entering the total enclosure through a forced makeup air duct, in standard cubic meters per hour (wet basis).
- (18) Q_{out_j} = the volumetric flow rate of gas stream (j) exiting the total enclosure through an exhaust duct or hood, in standard cubic meters per hour (wet basis).

- (19) R=the overall efficiency of the control system, expressed as a percentage.
- (20) S=the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.
- (21) W=the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.
- (22) ac=after the control system is installed and operated.
- (23) bc=before control.
- (24) C_f = the formaldehyde content of a finishing material (c), in pounds of formaldehyde per gallon of coating (lb/gal).
- (25) F_{total} = total formaldehyde emissions in each rolling 12 month period.
- (26) G_f = the formaldehyde content of a contact adhesive (g), in pounds of formaldehyde per gallon of contact adhesive (lb/gal).
- (27) V_c = the volume of formaldehyde-containing finishing material (c), in gal.
- (28) V_g = the volume of formaldehyde-containing contact adhesive (g), in gal.

[60 FR 62936, Dec. 7, 1995, as amended at 62 FR 30260, June 3, 1997; 62 FR 31363, June 9, 1997; 63 FR 71380, Dec. 28, 1998; 76 FR 72072, Nov. 21, 2011]

§ 63.802 Emission limits.

(a) Each owner or operator of an existing affected source subject to this subpart shall:

(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in § 63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in § 63.803(l)(2) for determining styrene and formaldehyde usage.

(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:

(i) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or

(ii) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented in paragraph (a)(2)(i) of this section, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.

(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

(4) Limit formaldehyde emissions by complying with the provisions specified in either paragraph (a)(4)(i) or (a)(4)(ii) of this section.

(i) Limit total formaldehyde (F_{total}) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.

(ii) Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations.

(b) Each owner or operator of a new affected source subject to this subpart shall:

(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this subpart using any of the compliance methods in § 63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in § 63.803(l)(2) for determining styrene and formaldehyde usage.

(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in § 63.804(e).

(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

(4) Limit formaldehyde emissions by complying with the provisions specified in either paragraph (b)(4)(i) or (b)(4)(ii) of this section.

(i) Limit total formaldehyde (F_{total}) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.

(ii) Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations.

(c) At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72072, Nov. 21, 2011]

§ 63.803 Work practice standards.

(a) *Work practice implementation plan.* (1) Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date.

(2) The written work practice implementation plan shall be available for inspection by the Administrator (or delegated State, local, or Tribal authority) upon request. If the Administrator (or delegated State, local, or Tribal authority) determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator (or delegated State, local, or Tribal authority) may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

(3) The inspection and maintenance plan required by paragraph (c) of this section and the formulation assessment plan for finishing operations required by paragraph (l) of this section are also reviewable by the Administrator (or delegated State, local, or Tribal authority).

(b) *Operator training course.* Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

- (1) A list of all current personnel by name and job description that are required to be trained;
- (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
- (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

(c) *Inspection and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
- (2) An inspection schedule;
- (3) Methods for documenting the date and results of each inspection and any repairs that were made;
- (4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

(d) *Cleaning and washoff solvent accounting system.* Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:

- (1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in § 63.801 of this subpart;
- (2) The number of pieces washed off, and the reason for the washoff; and
- (3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

(e) *Chemical composition of cleaning and washoff solvents.* Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.

(f) *Spray booth cleaning.* Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is

being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

(g) *Storage requirements.* Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

(h) *Application equipment requirements.* Each owner or operator of an affected source shall not use conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device.

(i) *Line cleaning.* Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

(j) *Gun cleaning.* Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

(k) *Washoff operations.* Each owner or operator of an affected source shall control emissions from washoff operations by:

(1) Using normally closed tanks for washoff; and

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(l) *Formulation assessment plan for finishing operations.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

(1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;

(2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in § 63.805 (d) or (e).

(3) Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

(4) If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(i) The exceedance is no more than 15.0 percent above the baseline level;

(ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in § 63.805 (d) or (e));

(iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

(5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If, after November 1998, an affected source uses a VHAP of potential concern listed in table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.

[60 FR 62936, Dec. 7, 1995, as amended at 63 FR 71380, Dec. 28, 1998; 68 FR 37353, June 23, 2003; 76 FR 72073, Nov. 21, 2011]

§ 63.804 Compliance procedures and monitoring requirements.

(a) The owner or operator of an existing affected source subject to § 63.802(a)(1) shall comply with those provisions using any of the methods presented in § 63.804 (a)(1) through (a)(4).

(1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;

$$E = (M_{c1} C_{c1} + M_{c2} C_{c2} + \dots + M_{cn} C_{cn} + S_1 W_1 + S_2 W_2 + \dots + S_n W_n) / (M_{c1} + M_{c2} + \dots + M_{cn}) \quad \text{Equation 1}$$

(2) Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.

(3) Use a control system with an overall control efficiency (R) such that the value of E_{ac} in Equation 2 is no greater than 1.0.

$$R = [(E_{bc} - E_{ac}) / E_{bc}] (100) \quad \text{Equation 2}$$

The value of E_{bc} in Equation 2 shall be calculated using Equation 1; or

(4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.

(b) The owner or operator of an affected source subject to § 63.802(a)(2)(i) shall comply with the provisions by using compliant foam adhesives with a VHAP content no greater than 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied.

(c) The owner or operator of an affected source subject to § 63.802(a)(2)(ii) shall comply with those provisions by using either of the methods presented in § 63.804 (c)(1) and (c)(2).

(1) Use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied; or

(2) Use a control system with an overall control efficiency (R) such that the value of G_{ac} is no greater than 1.0.

$$R = [(G_{bc} - G_{ac}) / G_{bc}] (100) \quad \text{Equation 3}$$

(d) The owner or operator of a new affected source subject to § 63.802(b)(1) may comply with those provisions by using any of the following methods:

(1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;

(2) Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

(3) Use a control system with an overall control efficiency (R) such that the value of E_{ac} in Equation 4 is no greater than 0.8.

$$R = [(E_{bc} - E_{ac}) / E_{bc}] (100) \quad \text{Equation 4}$$

The value of E_{bc} in Equation 4 shall be calculated using Equation 1; or

(4) Use any combination of an averaging approach, as described in (d)(1), compliant finishing materials, as described in (d)(2), and a control system, as described in (d)(3).

(e) The owner or operator of a new affected source subject to § 63.802(b)(2) shall comply with the provisions using either of the following methods:

(1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied; or

(2) Use a control system with an overall control efficiency (R) such that the value of G_{ac} in Equation 3 is no greater than 0.2.

(f) *Initial compliance.* (1) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by § 63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.

(2) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(2) or (d)(2) shall submit an initial compliance status report, as required by § 63.807(b), stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.

(3) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that are complying through the procedures established in § 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:

(i) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or

(ii) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

(4) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(3) or (d)(3) shall demonstrate initial compliance by:

(i) Submitting a monitoring plan that identifies each operating parameter to be monitored for the capture device and discusses why each parameter is appropriate for demonstrating continuous compliance;

(ii) Conducting an initial performance test as required under § 63.7 using the procedures and test methods listed in § 63.7 and § 63.805 (c) and (d) or (e);

(iii) Calculating the overall control efficiency (R) following the procedures in § 63.805 (d) or (e); and

(iv) Determining those operating conditions critical to determining compliance and establishing one or more operating parameters that will ensure compliance with the standard.

(A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter.

(B) For compliance with a catalytic incinerator equipped with a fixed catalyst bed, the minimum gas temperature both upstream and downstream of the catalyst bed shall be the operating parameter.

(C) For compliance with a catalytic incinerator equipped with a fluidized catalyst bed, the minimum gas temperature upstream of the catalyst bed and the pressure drop across the catalyst bed shall be the operating parameters.

(D) For compliance with a carbon adsorber, the operating parameters shall be the total regeneration mass stream flow for each regeneration cycle and the carbon bed temperature after each regeneration, or the concentration level of organic compounds exiting the adsorber, unless the owner or operator requests and receives approval from the Administrator to establish other operating parameters.

(E) For compliance with a control device not listed in this section, one or more operating parameter values shall be established using the procedures identified in § 63.804(g)(4)(vi).

(v) Owners or operators complying with § 63.804(f)(4) shall calculate each site-specific operating parameter value as the arithmetic average of the maximum or minimum operating parameter values, as appropriate, that demonstrate compliance with the standards, during the three test runs required by § 63.805(c)(1).

(5) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2) or (b)(2) that comply through the procedures established in § 63.804 (b), (c)(1), or (e)(1), shall submit an initial compliance status report, as required by § 63.807(b), stating that compliant contact adhesives are being used by the affected source.

(6) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2)(ii) or (b)(2) that comply through the procedures established in § 63.804 (c)(2) or (e)(2), shall demonstrate initial compliance by:

(i) Submitting a monitoring plan that identifies each operating parameter to be monitored for the capture device and discusses why each parameter is appropriate for demonstrating continuous compliance;

(ii) Conducting an initial performance test as required under § 63.7 using the procedures and test methods listed in § 63.7 and § 63.805 (c) and (d) or (e);

(iii) Calculating the overall control efficiency (R) following the procedures in § 63.805 (d) or (e); and

(iv) Determining those operating conditions critical to determining compliance and establishing one or more operating parameters that will ensure compliance with the standard.

(A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter.

(B) For compliance with a catalytic incinerator equipped with a fixed catalyst bed, the minimum gas temperature both upstream and downstream of the catalyst shall be the operating parameter.

(C) For compliance with a catalytic incinerator equipped with a fluidized catalyst bed, the minimum gas temperature upstream of the catalyst bed and the pressure drop across the catalyst bed shall be the operating parameters.

(v) Owners or operators complying with § 63.804(f)(6) shall calculate each site-specific operating parameter value as the arithmetic average of the maximum or minimum operating values as appropriate, that demonstrate compliance with the standards, during the three test runs required by § 63.805(c)(1).

(7) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(3) or (b)(3) shall submit an initial compliance status report, as required by § 63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in § 63.803 shall submit an initial compliance status report, as required by § 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

(g) *Continuous compliance demonstrations.* (1) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(2) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(3) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that are complying through the procedures established in § 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in paragraph (g)(3) (i) or (ii) of this section.

(i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required by § 63.807(c).

(A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(ii) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semiannual report required by § 63.807(c).

(A) The compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(C) An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in § 63.804 (a)(2) or (d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.

(4) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(3) or (d)(3) shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to manufacturer's specifications. The owner or operator shall also submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.807(d) and § 63.10(e) of subpart A.

(i) Where a capture/control device is used, a device to monitor each site-specific operating parameter established in accordance with § 63.804(f)(6)(i) is required.

(ii) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.

(A) Where a thermal incinerator is used, a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

(B) Where a catalytic incinerator equipped with a fixed catalyst bed is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.

(C) Where a catalytic incinerator equipped with a fluidized catalyst bed is used, a temperature monitoring device shall be installed in the gas stream immediately before the bed. In addition, a pressure monitoring device shall be installed to determine the pressure drop across the catalyst bed. The pressure drop shall be measured monthly at a constant flow rate.

(iii) Where a carbon adsorber is used one of the following is required:

(A) An integrating stream flow monitoring device having an accuracy of ± 10 percent, capable of recording the total regeneration stream mass flow for each regeneration cycle; and a carbon bed temperature monitoring device, having an accuracy of ± 1 percent of the temperature being monitored or ± 0.5 °C, whichever is greater, and capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle;

(B) An organic monitoring device, equipped with a continuous recorder, to indicate the concentration level of organic compounds exiting the carbon adsorber; or

(C) Any other monitoring device that has been approved by the Administrator in accordance with § 63.804(f)(4)(iv)(D).

(iv) Owners or operators of an affected source shall not operate the capture or control device at a daily average value greater than or less than (as appropriate) the operating parameter values. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.

(v) Owners or operators of an affected source that are complying through the use of a catalytic incinerator equipped with a fluidized catalyst bed shall maintain a constant pressure drop, measured monthly, across the catalyst bed.

(vi) An owner or operator who uses a control device not listed in § 63.804(f)(4) shall submit, for the Administrator's approval, a description of the device, test data verifying performance, and appropriate site-specific operating parameters that will be monitored to demonstrate continuous compliance with the standard.

(5) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2) (i) or (ii) or (b)(2) that comply through the procedures established in § 63.804 (b), (c)(1), or (e)(1), shall submit a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(6) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2)(ii) or (b)(2) that comply through the procedures established in § 63.804 (c)(2) or (e)(2), shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to the manufacturer's specifications. The owner or operator shall also submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.807(d) and § 63.10(e) of subpart A of this part.

(i) Where a capture/control device is used, a device to monitor each site-specific operating parameter established in accordance with § 63.804(f)(6)(i) is required.

(ii) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.

(A) Where a thermal incinerator is used, a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

(B) Where a catalytic incinerator equipped with a fixed catalyst bed is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.

(C) Where a catalytic incinerator equipped with a fluidized catalyst bed is used, a temperature monitoring device shall be installed in the gas stream immediately before the bed. In addition, a pressure monitoring device shall be installed to measure the pressure drop across the catalyst bed. The pressure drop shall be measured monthly at a constant flow rate.

(iii) Where a carbon adsorber is used one of the following is required:

(A) An integrating stream flow monitoring device having an accuracy of ± 10 percent, capable of recording the total regeneration stream mass flow for each regeneration cycle; and a carbon bed temperature monitoring device, having an accuracy of ± 1 percent of the temperature being monitored or ± 0.5 °C, whichever is greater, and capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle;

(B) An organic monitoring device, equipped with a continuous recorder, to indicate the concentration level of organic compounds exiting the carbon adsorber; or

(C) Any other monitoring device that has been approved by the Administrator in accordance with § 63.804(f)(4)(iv)(D).

(iv) Owners or operators of an affected source shall not operate the capture or control device at a daily average value greater than or less than (as appropriate) the operating parameter values. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.

(v) Owners or operators of an affected source that are complying through the use of a catalytic incinerator equipped with a fluidized catalyst bed shall maintain a constant pressure drop, measured monthly, across the catalyst bed.

(vi) An owner or operator using a control device not listed in this section shall submit to the Administrator a description of the device, test data verifying the performance of the device, and appropriate operating parameter values that will be monitored to demonstrate continuous compliance with the standard. Compliance using this device is subject to the Administrator's approval.

(7) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in § 63.803 shall submit a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not

implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(9) *Continuous compliance requirements.* You must demonstrate continuous compliance with the emissions standards and operating limits by using the performance test methods and procedures in § 63.805 for each affected source.

(i) *General requirements.* (A) You must monitor and collect data, and provide a site specific monitoring plan as required by §§ 63.804, 63.806 and 63.807.

(B) Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks and required zero and span adjustments), you must operate the monitoring system and collect data at all required intervals at all times the affected source is operating and periods of malfunction. Any period for which data collection is required and the operation of the CEMS is not otherwise exempt and for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.

(C) You may not use data recorded during monitoring system malfunctions, repairs associated with monitoring system malfunctions, or required monitoring system quality assurance or control activities in calculations used to report emissions or operating levels. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The owner or operator must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(ii) [Reserved]

(h) The owner or operator of an existing or new affected source subject to § 63.802(a)(4) or (b)(4) shall comply with those provisions by using either of the methods presented in § 63.804(h)(1) and (2) if complying with § 63.802(a)(4)(i) or (b)(4)(i) or by using the method presented in § 63.804(h)(3) if complying with § 63.802(a)(4)(ii) or (b)(4)(ii).

(1) Calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 5 and maintain a value of F_{total} no more than 400 pounds per rolling 12 month period.

$$F_{total} = (C_{f1} V_{c1} + C_{f2} V_{c2} + * * * + C_{fn} V_{cn} + G_{f1} V_{g1} + G_{f2} V_{g2} + * * * + G_{fn} V_{gn}) \text{ Equation 5}$$

(2) Use a control system with an overall control efficiency (R) such that the calculated value of F_{total} in Equation 6 is no more than 400 pounds per rolling 12 month period.

$$F_{total} = (C_{f1} V_{c1} + C_{f2} V_{c2} + * * * + C_{fn} V_{cn} + G_{f1} V_{g1} + G_{f2} V_{g2} + * * * + G_{fn} V_{gn}) * (1-R) \text{ Equation 6}$$

(3) Demonstrate compliance by use of coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives maintaining a certified product data sheet for each coating and contact adhesive used, as required by § 63.806(b)(1), and submitting a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact

adhesive that is not low-formaldehyde, as demonstrated by records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72073, Nov. 21, 2011]

§ 63.805 Performance test methods.

(a)(1) The EPA Method 311 of appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

(2) Performance tests shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

(b) Owners or operators demonstrating compliance in accordance with § 63.804 (f)(4) or (f)(6) and § 63.804 (g)(4) or (g)(6), or complying with any of the other emission limits of § 63.802 by operating a capture or control device shall determine the overall control efficiency of the control system (R) as the product of the capture and control device efficiency, using the test methods cited in § 63.805(c) and the procedures in § 63.805 (d) or (e).

(c) When an initial compliance demonstration is required by § 63.804 (f)(4) or (f)(6) of this subpart, the procedures in paragraphs (c)(1) through (c)(6) of this section shall be used in determining initial compliance with the provisions of this subpart.

(1) The EPA Method 18 (40 CFR part 60, appendix A) shall be used to determine the HAP concentration of gaseous air streams. The test shall consist of three separate runs, each lasting a minimum of 30 minutes.

(2) The EPA Method 1 or 1A (40 CFR part 60, appendix A) shall be used for sample and velocity traverses.

(3) The EPA Method 2, 2A, 2C, or 2D (40 CFR part 60, appendix A) shall be used to measure velocity and volumetric flow rates.

(4) The EPA Method 3 (40 CFR part 60, appendix A) shall be used to analyze the exhaust gases.

(5) The EPA Method 4 (40 CFR part 60, appendix A) shall be used to measure the moisture in the stack gas.

(6) The EPA Methods 2, 2A, 2C, 2D, 3, and 4 shall be performed, as applicable, at least twice during each test period.

(d) Each owner or operator of an affected source demonstrating compliance in accordance with § 63.804 (f)(4) or (f)(6) shall perform a gaseous emission test using the following procedures:

(1) Construct the overall HAP emission reduction system so that all volumetric flow rates and total HAP emissions can be accurately determined by the applicable test methods specified in § 63.805(c) (1) through (6);

(2) Determine capture efficiency from the affected emission point(s) by capturing, venting, and measuring all HAP emissions from the affected emission point(s). During a performance test, the owner or operator shall isolate affected emission point(s) located in an area with other nonaffected gaseous emission sources from all other gaseous emission point(s) by any of the following methods:

(i) Build a temporary total enclosure (see § 63.801) around the affected emission point(s); or

(ii) Use the building that houses the process as the enclosure (see § 63.801);

(iii) Use any alternative protocol and test method provided they meet either the requirements of the data quality objective (DQO) approach or the lower confidence level (LCL) approach (see § 63.801);

(iv) Shut down all nonaffected HAP emission point(s) and continue to exhaust fugitive emissions from the affected emission point(s) through any building ventilation system and other room exhausts such as drying ovens. All exhaust air must be vented through stacks suitable for testing; or

(v) Use another methodology approved by the Administrator provided it complies with the EPA criteria for acceptance under part 63, appendix A, Method 301.

(3) Operate the control device with all affected emission points that will subsequently be delivered to the control device connected and operating at maximum production rate;

(4) Determine the efficiency (F) of the control device using the following equation:

$$F = \frac{\sum_{i=1}^n Q_{di} C_{di} - \sum_{j=1}^p Q_{aj} C_{aj}}{\sum_{i=1}^n Q_{di} C_{di}} \quad (\text{Equation 5})$$

(5) Determine the efficiency (N) of the capture system using the following equation:

$$N = \frac{\sum_{i=1}^n Q_{di} C_{di}}{\sum_{i=1}^n Q_{di} C_{di} + \sum_{k=1}^p Q_{fk} C_{fk}} \quad (\text{Equation 6})$$

(6) For each affected source complying with § 63.802(a)(1) in accordance with § 63.804(a)(3), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of E_{ac} in Equation 2 is no greater than 1.0.

(7) For each new affected source complying with § 63.802(b)(1) in accordance with § 63.804(d)(3), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of E_{ac} in Equation 4 is no greater than 0.8.

(8) For each affected source complying with § 63.802(a)(2)(ii) in accordance with § 63.804(c)(2), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of G_{ac} in Equation 3 is no greater than 1.0.

(9) For each new affected source complying with § 63.802(b)(2) in accordance with § 63.804(e)(2), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of G_{ac} in Equation 3 is no greater than 0.2.

(e) An alternative method to the compliance method in § 63.805(d) is the installation of a permanent total enclosure around the affected emission point(s). A permanent total enclosure presents prima facie evidence that all HAP emissions from the affected emission point(s) are directed to the control device. Each affected source that complies using a permanent total enclosure shall:

(1) Demonstrate that the total enclosure meets the requirements in paragraphs (e)(1) (i) through (iv). The owner or operator of an enclosure that does not meet these requirements may apply to the Administrator for approval of the enclosure as a total enclosure on a case-by-case basis. The enclosure shall be considered a total enclosure if it is demonstrated to the satisfaction of the Administrator that all HAP emissions from the affected emission point(s) are contained and vented to the control device. The requirements for automatic approval are as follows:

(i) The total area of all natural draft openings shall not exceed 5 percent of the total surface area of the total enclosure's walls, floor, and ceiling;

(ii) All sources of emissions within the enclosure shall be a minimum of four equivalent diameters away from each natural draft opening;

(iii) The average inward face velocity (FV) across all natural draft openings shall be a minimum of 3,600 meters per hour as determined by the following procedures:

(A) All forced makeup air ducts and all exhaust ducts are constructed so that the volumetric flow rate in each can be accurately determined by the test methods specified in § 63.805 (c)(2) and (3). Volumetric flow rates shall be calculated without the adjustment normally made for moisture content; and

(B) Determine FV by the following equation:

$$FV = \frac{\sum_{j=1}^n Q_{out j} - \sum_{i=1}^p Q_{in i}}{\sum_{k=1}^q A_k} \quad (\text{Equation 7})$$

(iv) All access doors and windows whose areas are not included as natural draft openings and are not included in the calculation of FV shall be closed during routine operation of the process.

(2) Determine the control device efficiency using Equation (5), and the test methods and procedures specified in § 63.805 (c)(1) through (6).

(3) For each affected source complying with § 63.802(a)(1) in accordance with § 63.804(a)(3), compliance is demonstrated if:

(i) The installation of a permanent total enclosure is demonstrated (N=1);

(ii) The value of F is determined from Equation (5); and

(iii) The product of (F×N)(100) yields a value (R) such that the value of E_{ac} in Equation 2 is no greater than 1.0.

(4) For each new affected source complying with § 63.802(b)(1) in accordance with § 63.804(d)(3), compliance is demonstrated if:

- (i) The installation of a permanent total enclosure is demonstrated ($N = 1$);
- (ii) The value of F is determined from Equation (5); and
- (iii) The product of $(F \times N)(100)$ yields a value (R) such that the value of E_{ac} in Equation 4 is no greater than 0.8.

(5) For each affected source complying with § 63.802(a)(2)(ii) in accordance with § 63.804(c)(2), compliance is demonstrated if:

- (i) The installation of a permanent total enclosure is demonstrated ($N=1$);
- (ii) The value of F is determined from Equation (5); and
- (iii) The product of $(F \times N)(100)$ yields a value (R) such that the value of G_{ac} in Equation 3 is no greater than 1.0.

(6) For each new affected source complying with § 63.802(b)(2) in accordance with § 63.804(e)(2), compliance is demonstrated if:

- (i) The installation of a permanent total enclosure is demonstrated ($N=1$);
- (ii) The value of F is determined from Equation (5); and
- (iii) The product of $(F \times N)(100)$ yields a value (R) such that the value of G_{ac} in Equation 3 is no greater than 0.2.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72073, Nov. 21, 2011]

§ 63.806 Recordkeeping requirements.

(a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of § 63.10 of subpart A, according to the applicability criteria in § 63.800(d) of this subpart.

(b) The owner or operator of an affected source subject to the emission limits in § 63.802 of this subpart shall maintain records of the following:

- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in § 63.802; and
- (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in § 63.802; and
- (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in § 63.802 (a)(3) or (b)(3).
- (4) The formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits in § 63.802(a)(4) or (b)(4) and chooses to comply with the 400 lb/yr limits on formaldehyde in § 63.802(a)(4) (i) or (b)(4)(i).

(c) The owner or operator of an affected source following the compliance method in § 63.804 (a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.

(d) The owner or operator of an affected source following the compliance procedures of § 63.804 (f)(3)(ii) and (g)(3)(ii) shall maintain the records required by § 63.806(b) as well as records of the following:

- (1) Solvent and coating additions to the continuous coater reservoir;
- (2) Viscosity measurements; and
- (3) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.

(e) The owner or operator of an affected source subject to the work practice standards in § 63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

- (1) Records demonstrating that the operator training program required by § 63.803(b) is in place;
- (2) Records collected in accordance with the inspection and maintenance plan required by § 63.803(c);
- (3) Records associated with the cleaning solvent accounting system required by § 63.803(d);
- (4) [Reserved]
- (5) Records associated with the formulation assessment plan required by § 63.803(l); and

(6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

(f) The owner or operator of an affected source following the compliance method of § 63.804 (f)(4) or (g)(4) shall maintain copies of the calculations demonstrating that the overall control efficiency (R) of the control system results in the value of E_{ac} required by Equations 2 or 4, records of the operating parameter values, and copies of the semiannual compliance reports required by § 63.807(d).

(g) The owner or operator of an affected source following the compliance method of § 63.804 (f)(6) or (g)(6), shall maintain copies of the calculations demonstrating that the overall control efficiency (R) of the control system results in the applicable value of G_{ac} calculated using Equation 3, records of the operating parameter values, and copies of the semiannual compliance reports required by § 63.807(d).

(h) The owner or operator of an affected source subject to the emission limits in § 63.802 and following the compliance provisions of § 63.804(f) (1), (2), (3), (5), (7) and (8) and § 63.804(g) (1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with § 63.807(c) for each semiannual period following the compliance date.

(i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by § 63.9(h) and § 63.807(b) and the semiannual reports required by § 63.807(c).

(j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of § 63.10(b)(1).

(k) The owner or operator of an affected source subject to this subpart shall maintain records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control equipment and monitoring equipment. The owner or operator shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.802(c), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

§ 63.807 Reporting requirements.

(a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of § 63.7 through § 63.10 of subpart A (General Provisions) according to the applicability criteria in § 63.800(d) of this subpart.

(b) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by § 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by § 63.804(f) (1), (2), (3), (5), (7), and (8) of this subpart.

(c) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(g)(1), (2), (3), (5), (7), (8), (h)(1), and (h)(3) shall submit a report covering the previous 6 months of wood furniture manufacturing operations.

(1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

(2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

(3) The semiannual reports shall include the information required by § 63.804(g) (1), (2), (3), (5), (7), (8), (h)(1), and (h)(3), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance. If there was a malfunction during the reporting period, the report shall also include the number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.802(c), including actions taken to correct a malfunction.

(4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

(d) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(g)(4), (6), and (h)(2) of this subpart shall submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.10(e) of subpart A. The report shall include the monitored operating parameter values required by § 63.804(g) (4) and (6). If the source experiences excess emissions, the report shall be submitted quarterly for at least 1 year after the excess emissions occur and until a request to reduce reporting frequency is approved, as indicated in § 63.10(e)(3)(C). If no excess emissions occur, the report shall be submitted semiannually.

(e) The owner or operator of an affected source required to provide a written notification under § 63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]

§ 63.808 Implementation and enforcement.

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of alternatives to the requirements in §§ 63.800, 63.802, and 63.803(a)(1), (b), (c) introductory text, and (d) through (l).

(2) Approval of alternatives to the monitoring and compliance requirements in §§ 63.804(f)(4)(iv)(D) and (E), 63.804(g)(4)(iii)(C), 63.804(g)(4)(vi), and 63.804(g)(6)(vi).

(3) Approval of major alternatives to test methods under § 63.7(e)(2)(ii) and (f), as defined in § 63.90, and as required in this subpart, as well as approval of any alternatives to the specific test methods under §§ 63.805(a), 63.805(d)(2)(v), and 63.805(e)(1).

(4) Approval of major alternatives to monitoring under § 63.8(f), as defined in § 63.90, and as required in this subpart.

(5) Approval of major alternatives to recordkeeping and reporting under § 63.10(f), as defined in § 63.90, and as required in this subpart.

[68 FR 37354, June 23, 2003]

§§ 63.809-63.819 [Reserved]

Table 1 to Subpart JJ of Part 63—General Provisions Applicability to Subpart JJ

Reference	Applies to subpart JJ	Comment
63.1(a)	Yes	
63.1(b)(1)	No	Subpart JJ specifies applicability.
63.1(b)(2)	Yes	
63.1(b)(3)	Yes	
63.1(c)(1)	No	Subpart JJ specifies applicability.
63.1(c)(2)	No	Area sources are not subject to subpart JJ.
63.1(c)(4)	Yes	
63.1(c)(5)	Yes	
63.1(e)	Yes	
63.2	Yes	Additional terms are defined in 63.801(a) of subpart JJ. When overlap between subparts A and JJ occurs, subpart JJ takes precedence.
63.3	Yes	Other units used in subpart JJ are defined in 63.801(b).
63.4	Yes	
63.5	Yes	
63.6(a)	Yes	
63.6(b)(1)	Yes	
63.6(b)(2)	Yes	
63.6(b)(3)	Yes	
63.6(b)(4)	No	May apply when standards are proposed under Section 112(f) of the CAA.
63.6(b)(5)	Yes	
63.6(b)(7)	Yes	
63.6(c)(1)	Yes	
63.6(c)(2)	No	
63.6(c)(5)	Yes	

Reference	Applies to subpart JJ	Comment
63.6(e)(1)(i)	No	See § 63.802(c) for general duty requirement.
63.6(e)(1)(ii)	No.	
63.6(e)(1)(iii)	Yes.	
63.6(e)(2)	No	Section reserved.
63.6(e)(3)	No.	
63.6(f)(1)	No	Affected sources complying through the procedures specified in 63.804 (a)(1), (a)(2), (b), (c)(1), (d)(1), (d)(2), (e)(1), and (e)(2) are subject to the emission standards at all times, including periods of startup, shutdown, and malfunction.
63.6(f)(2)	Yes	
63.6(f)(3)	Yes	
63.6(g)	Yes	
63.6(h)	No	
63.6 (i)(1)-(i)(3)	Yes	
63.6(i)(4)(i)	Yes	
63.6(i)(4)(ii)	No	
63.6 (i)(5)-(i)(14)	Yes	
63.6(i)(16)	Yes	
63.6(j)	Yes	
63.7(a)-(d)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.7(e)(1)	No	See § 63.805(a)(1).
63.7(e)(2)-(e)(4)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(a)-(b)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(c)(1)(i)	No.	
63.8(c)(1)(ii)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(c)(1)(iii)	No.	
63.8(c)(2)-(d)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(d)(3)	Yes, except for last sentence	Applies only to affected sources using a control device to comply with the rule.
63.8(e)-(g)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(a)	Yes	
63.9(b)	Yes	Existing sources are required to submit initial notification report within 270 days of the effective date.
63.9(c)	Yes	
63.9(d)	Yes	
63.9(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(f)	No	
63.9(g)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(h)	Yes	63.9(h)(2)(ii) applies only to affected sources using a control device to comply with the rule.
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	
63.10(b)(1)	Yes	
63.10(b)(2)(i)	No.	

Reference	Applies to subpart JJ	Comment
63.10(b)(2)(ii)	No	See § 63.806(k) for recordkeeping of occurrence and duration of malfunctions and recordkeeping of actions taken during malfunctions.
63.10(b)(2)(iii)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(b)(2)(iv)-(b)(2)(v)	No.	
63.10(b)(2)(vi)-(b)(2)(xiv)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(b)(3)	Yes	
63.10(c)(1)-(9)	Yes.	
63.10(c)(10)-(11)	No	See § 63.806(k) for recordkeeping of malfunctions.
63.10(c)(12)-(14)	Yes.	
63.10(c)(15)	No.	
63.10(d)(1)	Yes	
63.10(d)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(d)(3)	No	
63.10(d)(4)	Yes	
63.10(d)(5)	No	See § 63.807(c)(3) for reporting of malfunctions.
63.10(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(f)	Yes	
63.11	No	
63.12-63.15	Yes	

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]

Table 2 to Subpart JJ of Part 63—List of Volatile Hazardous Air Pollutants

Chemical name	CAS No.
Acetaldehyde	75070
Acetamide	60355
Acetonitrile	75058
Acetophenone	98862
2-Acetylaminofluorine	53963
Acrolein	107028
Acrylamide	79061
Acrylic acid	79107
Acrylonitrile	107131
Allyl chloride	107051
4-Aminobiphenyl	92671
Aniline	62533
o-Anisidine	90040
Benzene	71432
Benzidine	92875
Benzotrichloride	98077
Benzyl chloride	100447
Biphenyl	92524

Chemical name	CAS No.
Bis (2-ethylhexyl) phthalate (DEHP)	117817
Bis (chloromethyl) ether	542881
Bromoform	75252
1,3-Butadiene	106990
Carbon disulfide	75150
Carbon tetrachloride	56235
Carbonyl sulfide	463581
Catechol	120809
Chloroacetic acid	79118
2-Chloroacetophenone	532274
Chlorobenzene	108907
Chloroform	67663
Chloromethyl methyl ether	107302
Chloroprene	126998
Cresols (isomers and mixture)	1319773
o-Cresol	95487
m-Cresol	108394
p-Cresol	106445
Cumene	98828
2,4-D (2,4-Dichlorophenoxyacetic acid, including salts and esters)	94757
DDE (1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene)	72559
Diazomethane	334883
Dibenzofuran	132649
1,2-Dibromo-3-chloropropane	96128
Dibutylphthalate	84742
1,4-Dichlorobenzene	106467
3,3'-Dichlorobenzidine	91941
Dichloroethyl ether (Bis(2-chloroethyl)ether)	111444
1,3-Dichloropropene	542756
Diethanolamine	111422
N,N-Dimethylaniline	121697
Diethyl sulfate	64675
3,3'-Dimethoxybenzidine	119904
4-Dimethylaminoazobenzene	60117
3,3'-Dimethylbenzidine	119937
Dimethylcarbamoyl chloride	79447
N,N-Dimethylformamide	68122
1,1-Dimethylhydrazine	57147
Dimethyl phthalate	131113
Dimethyl sulfate	77781
4,6-Dinitro-o-cresol, and salts	534521
2,4-Dinitrophenol	51285
2,4-Dinitrotoluene	121142
1,4-Dioxane (1,4-Diethyleneoxide)	123911

Chemical name	CAS No.
1,2-Diphenylhydrazine	122667
Epichlorohydrin (1-Chloro-2,3-epoxypropane)	106898
1,2-Epoxybutane	106887
Ethyl acrylate	140885
Ethylbenzene	100414
Ethyl carbamate (Urethane)	51796
Ethyl chloride (Chloroethane)	75003
Ethylene dibromide (Dibromoethane)	106934
Ethylene dichloride (1,2-Dichloroethane)	107062
Ethylene glycol	107211
Ethylene oxide	75218
Ethylenethiourea	96457
Ethylidene dichloride (1,1-Dichloroethane)	75343
Formaldehyde	50000
Glycolethers ^a	
Hexachlorobenzene	118741
Hexachloro-1,3-butadiene	87683
Hexachloroethane	67721
Hexamethylene-1,6-diisocyanate	822060
Hexamethylphosphoramide	680319
Hexane	110543
Hydrazine	302012
Hydroquinone	123319
Isophorone	78591
Maleic anhydride	108316
Methanol	67561
Methyl bromide (Bromomethane)	74839
Methyl chloride (Chloromethane)	74873
Methyl chloroform (1,1,1-Trichloroethane)	71556
Methyl ethyl ketone (2-Butanone)	78933
Methylhydrazine	60344
Methyl iodide (Iodomethane)	74884
Methyl isobutyl ketone (Hexone)	108101
Methyl isocyanate	624839
Methyl methacrylate	80626
Methyl tert-butyl ether	1634044
4,4'-Methylenebis (2-chloroaniline)	101144
Methylene chloride (Dichloromethane)	75092
4,4'-Methylenediphenyl diisocyanate (MDI)	101688
4,4'-Methylenedianiline	101779
Naphthalene	91203
Nitrobenzene	98953
4-Nitrobiphenyl	92933
4-Nitrophenol	100027

Chemical name	CAS No.
2-Nitropropane	79469
N-Nitroso-N-methylurea	684935
N-Nitrosodimethylamine	62759
N-Nitrosomorpholine	59892
Phenol	108952
p-Phenylenediamine	106503
Phosgene	75445
Phthalic anhydride	85449
Polychlorinated biphenyls (Aroclors)	1336363
Polycyclic Organic Matter ^b	
1,3-Propane sultone	1120714
beta-Propiolactone	57578
Propionaldehyde	123386
Propoxur (Baygon)	114261
Propylene dichloride (1,2-Dichloropropane)	78875
Propylene oxide	75569
1,2-Propylenimine (2-Methyl aziridine)	75558
Quinone	106514
Styrene	100425
Styrene oxide	96093
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746016
1,1,2,2-Tetrachloroethane	79345
Tetrachloroethylene (Perchloroethylene)	127184
Toluene	108883
2,4-Toluenediamine	95807
Toluene-2,4-diisocyanate	584849
o-Toluidine	95534
1,2,4-Trichlorobenzene	120821
1,1,2-Trichloroethane	79005
Trichloroethylene	79016
2,4,5-Trichlorophenol	95954
2,4,6-Trichlorophenol	88062
Triethylamine	121448
Trifluralin	1582098
2,2,4-Trimethylpentane	540841
Vinyl acetate	108054
Vinyl bromide	593602
Vinyl chloride	75014
Vinylidene chloride (1,1-Dichloroethylene)	75354
Xylenes (isomers and mixture)	1330207
o-Xylene	95476
m-Xylene	108383
p-Xylene	106423

^a Includes mono- and di-ethers of ethylene glycol, diethylene glycols and triethylene glycol; R-(OCH₂CH₂)_n-OR where:

n = 1, 2, or 3,

R = alkyl or aryl groups

R' = R, H, or groups which, when removed, yield glycol ethers with the structure: R-(OCH₂CH₂)_n-OH. Polymers are excluded from the glycol category.

^b Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.

[63 FR 71381, Dec. 28, 1998]

Table 3 to Subpart JJ of Part 63—Summary of Emission Limits

Emission point	Existing source	New source
Finishing Operations:		
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	^a 1.0	^a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):		
—stains	^a 1.0	^a 1.0
—washcoats	^{a,b} 1.0	^{a,b} 0.8
—sealers	^a 1.0	^a 0.8
—topcoats	^a 1.0	^a 0.8
—basecoats	^{a,b} 1.0	^{a,b} 0.8
—enamels	^{a,b} 1.0	^{a,b} 0.8
—thinners (maximum percent VHAP allowable); or	10.0	10.0
(c) As an alternative, use control device; or	^c 1.0	^c 0.8
(d) Use any combination of (a), (b), and (c)	1.0	0.8
Cleaning Operations:		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8	0.8
Contact Adhesives:		
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates	^d NA	^d NA
ii. For foam adhesives used in products that meet flammability requirements	1.8	0.2
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	1.0	0.2
(b) Use a control device	^e 1.0	^e 0.2
All Finishing Operations and Contact Adhesives:		
(a) Achieve total free formaldehyde emissions across all finishing operations and contact adhesives, lb per rolling 12 month period, as applied	400	400

Emission point	Existing source	New source
(b) Use coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives	^f 1.0	^f 1.0

^a The limits refer to the VHAP content of the coating, as applied.

^b Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.

^c The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

^d There is no limit on the VHAP content of these adhesives.

^e The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

^f The limits refer to the formaldehyde content by weight of the coating or contact adhesive, as specified on certified product data sheets.

[60 FR 62936, Dec. 7, 1995, as amended at 62 FR 30260, June 3, 1997; 76 FR 72073, Nov. 21, 2011]

Table 4 to Subpart JJ of Part 63—Pollutants Excluded From Use in Cleaning and Washoff Solvents

Chemical name	CAS No.
4-Aminobiphenyl	92671
Styrene oxide	96093
Diethyl sulfate	64675
N-Nitrosomorpholine	59892
Dimethyl formamide	68122
Hexamethylphosphoramide	680319
Acetamide	60355
4,4'-Methylenedianiline	101779
o-Anisidine	90040
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746016
Beryllium salts	
Benzidine	92875
N-Nitroso-N-methylurea	684935
Bis (chloromethyl) ether	542881
Dimethyl carbamoyl chloride	79447
Chromium compounds (hexavalent)	
1,2-Propylenimine (2-Methyl aziridine)	75558
Arsenic and inorganic arsenic compounds	99999904
Hydrazine	302012
1,1-Dimethyl hydrazine	57147
Beryllium compounds	7440417

Chemical name	CAS No.
1,2-Dibromo-3-chloropropane	96128
N-Nitrosodimethylamine	62759
Cadmium compounds	
Benzo (a) pyrene	50328
Polychlorinated biphenyls (Aroclors)	1336363
Heptachlor	76448
3,3'-Dimethyl benzidine	119937
Nickel subsulfide	12035722
Acrylamide	79061
Hexachlorobenzene	118741
Chlordane	57749
1,3-Propane sultone	1120714
1,3-Butadiene	106990
Nickel refinery dust	
2-Acetylaminoflourine	53963
3,3'-Dichlorobenzidine	53963
Lindane (hexachlorcyclohexane, gamma)	58899
2,4-Toluene diamine	95807
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444
1,2-Diphenylhydrazine	122667
Toxaphene (chlorinated camphene)	8001352
2,4-Dinitrotoluene	121142
3,3'-Dimethoxybenzidine	119904
Formaldehyde	50000
4,4'-Methylene bis (2-chloroaniline)	101144
Acrylonitrile	107131
Ethylene dibromide (1,2-Dibromoethane)	106934
DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	72559
Chlorobenzilate	510156
Dichlorvos	62737
Vinyl chloride	75014
Coke Oven Emissions	
Ethylene oxide	75218
Ethylene thiourea	96457
Vinyl bromide (bromoethene)	593602
Selenium sulfide (mono and di)	7488564
Chloroform	67663
Pentachlorophenol	87865
Ethyl carbamate (Urethane)	51796
Ethylene dichloride (1,2-Dichloroethane)	107062
Propylene dichloride (1,2-Dichloropropane)	78875
Carbon tetrachloride	56235
Benzene	71432
Methyl hydrazine	60344

Chemical name	CAS No.
Ethyl acrylate	140885
Propylene oxide	75569
Aniline	62533
1,4-Dichlorobenzene(p)	106467
2,4,6-Trichlorophenol	88062
Bis (2-ethylhexyl) phthalate (DEHP)	117817
o-Toluidine	95534
Propoxur	114261
1,4-Dioxane (1,4-Diethyleneoxide)	123911
Acetaldehyde	75070
Bromoform	75252
Captan	133062
Epichlorohydrin	106898
Methylene chloride (Dichloromethane)	75092
Dibenz (ah) anthracene	53703
Chrysene	218019
Dimethyl aminoazobenzene	60117
Benzo (a) anthracene	56553
Benzo (b) fluoranthene	205992
Antimony trioxide	1309644
2-Nitropropane	79469
1,3-Dichloropropene	542756
7, 12-Dimethylbenz(a) anthracene	57976
Benz(c) acridine	225514
Indeno(1,2,3-cd)pyrene	193395
1,2:7,8-Dibenzopyrene	189559

[63 FR 71382, Dec. 28, 1998]

Table 5 to Subpart JJ of Part 63—List of VHAP of Potential Concern Identified by Industry

CAS No.	Chemical name	EPA de minimis, tons/yr
68122	Dimethyl formamide	1.0
50000	Formaldehyde	0.2
75092	Methylene chloride	4.0
79469	2-Nitropropane	1.0
78591	Isophorone	0.7
1000425	Styrene monomer	1.0
108952	Phenol	0.1
111422	Dimethanolamine	5.0
109864	2-Methoxyethanol	10.0
111159	2-Ethoxyethyl acetate	10.0

[63 FR 71382, Dec. 28, 1998]

Table 6 to Subpart JJ of Part 63—VHAP of Potential Concern

CAS No.	Chemical name	EPA de minimis, tons/yr*
92671	4-Aminobiphenyl	1.0
96093	Styrene oxide	1.0
64675	Diethyl sulfate	1.0
59892	N-Nitrosomorpholine	1.0
68122	Dimethyl formamide	1.0
680319	Hexamethylphosphoramide	0.01
60355	Acetamide	1.0
101779	4,4'-Methylenedianiline	1.0
90040	o-Anisidine	1.0
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.00000006
92875	Benzidine	0.00003
684935	N-Nitroso-N-methylurea	0.00002
542881	Bis(chloromethyl) ether	0.00003
79447	Dimethyl carbamoyl chloride	0.002
75558	1,2-Propylenimine (2-Methyl aziridine)	0.0003
57147	1,1-Dimethyl hydrazine	0.0008
96128	1,2-Dibromo-3-chloropropane	0.001
62759	N-Nitrosodimethylamine	0.0001
50328	Benzo (a) pyrene	0.001
1336363	Polychlorinated biphenyls (Aroclors)	0.0009
76448	Heptachlor	0.002
119937	3,3'-Dimethyl benzidine	0.001
79061	Acrylamide	0.002
118741	Hexachlorobenzene	0.004
57749	Chlordane	0.005
1120714	1,3-Propane sultone	0.003
106990	1,3-Butadiene	0.007
53963	2-Acetylaminoflourine	0.0005
91941	3,3'-Dichlorobenzidine	0.02
58899	Lindane (hexachlorocyclohexane, gamma)	0.005
95807	2,4-Toluene diamine	0.002
111444	Dichloroethyl ether (Bis(2-chloroethyl)ether)	0.006
122667	1,2—Diphenylhydrazine	0.009
8001352	Toxaphene (chlorinated camphene)	0.006
121142	2,4-Dinitrotoluene	0.002
119904	3,3'-Dimethoxybenzidine	0.01
50000	Formaldehyde	0.2
101144	4,4'-Methylene bis(2-chloroaniline)	0.02
107131	Acrylonitrile	0.03
106934	Ethylene dibromide(1,2-Dibromoethane)	0.01
72559	DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	0.01
510156	Chlorobenzilate	0.04

CAS No.	Chemical name	EPA de minimis, tons/yr*
62737	Dichlorvos	0.02
75014	Vinyl chloride	0.02
75218	Ethylene oxide	0.09
96457	Ethylene thiourea	0.06
593602	Vinyl bromide (bromoethene)	0.06
67663	Chloroform	0.09
87865	Pentachlorophenol	0.07
51796	Ethyl carbamate (Urethane)	0.08
107062	Ethylene dichloride (1,2-Dichloroethane)	0.08
78875	Propylene dichloride (1,2-Dichloropropane)	0.1
56235	Carbon tetrachloride	0.1
71432	Benzene	0.2
140885	Ethyl acrylate	0.1
75569	Propylene oxide	0.5
62533	Aniline	0.1
106467	1,4-Dichlorobenzene(p)	0.3
88062	2,4,6-Trichlorophenol	0.6
117817	Bis (2-ethylhexyl) phthalate (DEHP)	0.5
95534	o-Toluidine	0.4
114261	Propoxur	2.0
79016	Trichloroethylene	1.0
123911	1,4-Dioxane (1,4-Diethyleneoxide)	0.6
75070	Acetaldehyde	0.9
75252	Bromoform	2.0
133062	Captan	2.0
106898	Epichlorohydrin	2.0
75092	Methylene chloride (Dichloromethane)	4.0
127184	Tetrachloroethylene (Perchloroethylene)	4.0
53703	Dibenz (ah) anthracene	0.01
218019	Chrysene	0.01
60117	Dimethyl aminoazobenzene	1.0
56553	Benzo (a) anthracene	0.01
205992	Benzo (b) fluoranthene	0.01
79469	2-Nitropropane	1.0
542756	1,3-Dichloropropene	1.0
57976	7,12-Dimethylbenz (a) anthracene	0.01
225514	Benz(c)acridine	0.01
193395	Indeno(1,2,3-cd)pyrene	0.01
189559	1,2:7,8-Dibenzopyrene	0.01
79345	1,1,2,2-Tetrachloroethane	0.03
91225	Quinoline	0.0006
75354	Vinylidene chloride (1,1-Dichloroethylene)	0.04
87683	Hexachlorobutadiene	0.09
82688	Pentachloronitrobenzene (Quintobenzene)	0.03

CAS No.	Chemical name	EPA de minimis, tons/yr*
78591	Isophorone	0.7
79005	1,1,2-Trichloroethane	0.1
74873	Methyl chloride (Chloromethane)	1.0
67721	Hexachloroethane	0.5
1582098	Trifluralin	0.9
1319773	Cresols/Cresylic acid (isomers and mixture)	1.0
108394	m-Cresol	1.0
75343	Ethylidene dichloride (1,1-Dichloroethane)	1.0
95487	o-Cresol	1.0
106445	p-Cresol	1.0
74884	Methyl iodide (Iodomethane)	1.0
100425	Styrene	1.0
107051	Allyl chloride	1.0
334883	Diazomethane	1.0
95954	2,4,5—Trichlorophenol	1.0
133904	Chloramben	1.0
106887	1,2—Epoxybutane	1.0
108054	Vinyl acetate	1.0
126998	Chloroprene	1.0
123319	Hydroquinone	1.0
92933	4-Nitrobiphenyl	1.0
56382	Parathion	0.1
13463393	Nickel Carbonyl	0.1
60344	Methyl hydrazine	0.006
151564	Ethylene imine	0.0003
77781	Dimethyl sulfate	0.1
107302	Chloromethyl methyl ether	0.1
57578	beta-Propiolactone	0.1
100447	Benzyl chloride	0.04
98077	Benzotrichloride	0.0006
107028	Acrolein	0.04
584849	2,4—Toluene diisocyanate	0.1
75741	Tetramethyl lead	0.01
78002	Tetraethyl lead	0.01
12108133	Methylcyclopentadienyl manganese	0.1
624839	Methyl isocyanate	0.1
77474	Hexachlorocyclopentadiene	0.1
62207765	Fluomine	0.1
10210681	Cobalt carbonyl	0.1
79118	Chloroacetic acid	0.1
534521	4,6-Dinitro-o-cresol, and salts	0.1
101688	Methylene diphenyl diisocyanate	0.1
108952	Phenol	0.1
62384	Mercury, (acetato-o) phenyl	0.01

CAS No.	Chemical name	EPA de minimis, tons/yr*
98862	Acetophenone	1.0
108316	Maleic anhydride	1.0
532274	2-Chloroacetophenone	0.06
51285	2,4-Dinitrophenol	1.0
109864	2-Methoxy ethanol	10.0
98953	Nitrobenzene	1.0
74839	Methyl bromide (Bromomethane)	10.0
75150	Carbon disulfide	1.0
121697	N,N-Dimethylaniline	1.0
106514	Quinone	5.0
123386	Propionaldehyde	5.0
120809	Catechol	5.0
85449	Phthalic anhydride	5.0
463581	Carbonyl sulfide	5.0
132649	Dibenzofurans	5.0
100027	4-Nitrophenol	5.0
540841	2,2,4-Trimethylpentane	5.0
111422	Diethanolamine	5.0
822060	Hexamethylene-1,6-diisocyanate	5.0
	Glycol ethers ^a	5.0
	Polycyclic organic matter ^b	0.01

* These values are based on the de minimis levels provided in the proposed rulemaking pursuant to section 112(g) of the Act using a 70-year lifetime exposure duration for all VHAP. Default assumptions and the de minimis values based on inhalation reference doses (RfC) are not changed by this adjustment.

^a Except for ethylene glycol butyl ether, ethylene glycol ethyl ether (2-ethoxy ethanol), ethylene glycol hexyl ether, ethylene glycol methyl ether (2-methoxyethanol), ethylene glycol phenyl ether, ethylene glycol propyl ether, ethylene glycol mono-2-ethylhexyl ether, diethylene glycol butyl ether, diethylene glycol ethyl ether, diethylene glycol methyl ether, diethylene glycol hexyl ether, diethylene glycol phenyl ether, diethylene glycol propyl ether, triethylene glycol butyl ether, triethylene glycol ethyl ether, triethylene glycol methyl ether, triethylene glycol propyl ether, ethylene glycol butyl ether acetate, ethylene glycol ethyl ether acetate, and diethylene glycol ethyl ether acetate.

^b Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah) anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

[63 FR 71383, Dec. 28, 1998]

**Indiana Department of Environmental Management
Office of Air Quality**

Addendum to the Technical Support Document (ATSD) for a
Part 70 Operating Permit Renewal And Significant Source Modification

Source Background and Description

Source Name:	Hartson-Kennedy Cabinet Top Company, Inc.
Source Location:	522 West 22nd Street, Marion, IN 46953-2926
County:	Grant
SIC Code:	2541
Permit Renewal No.:	T053-30261-00032
Significant Source Modification No.:	053-34492-00032
Permit Reviewer:	Julie Alexander

On June 4, 2014, the Office of Air Quality (OAQ) had a notice published in the Marion Chronical Tribune, Marion, Indiana, stating that Hartson-Kennedy Cabinet Top Company, Inc. had applied for a Part 70 Operating Permit Renewal and Significant Source Modification to renew the operating permit and include changes in coatings used at the facility. The notice also stated that the OAQ proposed to issue a Part 70 Operating Permit Renewal and Significant Source Modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

In order to minimize future revisions to permit attachments, IDEM will not include the company name or source city/state on federal rule attachments to a permit. Therefore, the following attachments have been revised to reflect this change:

Attachment A: 40 CFR 63 Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations

IDEM Contact

- (a) Questions regarding this proposed Part 70 Renewal and Significant Source Modification can be directed to Julie Alexander at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal
And Significant Source Modification

Source Background and Description

Source Name:	Hartson-Kennedy Cabinet Top Company, Inc.
Source Location:	522 West 22nd Street, Marion, IN 46953-2926
County:	Grant
SIC Code:	2541
Permit Renewal No.:	T053-30261-00032
Significant Source Modification No.:	053-34492-00032
Permit Reviewer:	Julie Alexander

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application and source modification application from Hartson-Kennedy Cabinet Top Company, Inc. (Hartson-Kennedy) relating to the operation of a stationary cabinet top manufacturing source. On February 24, 2011, Hartson-Kennedy submitted an application to the OAQ requesting to renew its operating permit. Hartson-Kennedy was issued its first Part 70 Operating Permit Renewal (T053-17618-00032) on November 22, 2006. On May 2, 2014, Hartson-Kennedy submitted an application to modify its existing stationary cabinet top manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, each equipped with airless spray applicators and dry filters for overspray control.
 - (1) One (1) adhesive spray booth for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.
 - (2) One (1) adhesive spray booth for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.
 - (3) One (1) adhesive spray booth for Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.
- (b) One (1) adhesive spray booth for Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 for modification, with a total capacity of 37.5 parts per hour and exhausting through Stack 6.
- (c) Four (4) woodworking operations, collectively identified as EU-2, equipped with an integral cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) woodworking operations is associated with each of the following lines:

- (1) The Main Line (Line 1), installed in 1976.
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.
 - (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.
 - (4) The Etop Line (Line 4) installed in 1976.
- (d) Three (3) wash areas, collectively identified as EU-3, each with a capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) wash area is associated with each of the following lines:
- (1) The Main Line (Line 1), installed in 1976.
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.
 - (3) The Etop Line (Line 4) installed in 1976.
- (e) One (1) custom area for thinner washoff operations, identified as EU-4, installed in 1976 and modified in 2002, capacity: 315 linear feet of wood cabinet tops per hour, total.

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

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

- (a) One (1) wash area associated with the Duraform/Diamond Cut Line (Line 3) installed in 2002, capacity: 2,100 linear feet of wood cabinet tops per hour or 12,785 pounds of particle board and 995 pounds of laminate per hour.
- (b) One (1) adhesive roll coating booth identified as Flat Panel, identified as EU-5, installed in 2002, capacity: 1,280 pounds of particle board per hour and 98 pounds of laminate per hour. This unit is considered a new affected source under 40 CFR 63, Subpart JJ.
- (c) Cutting and grinding operations (Solid Surface Line) equipped with an integral AGET cyclone and baghouse system, identified as CE-2, installed in 2000, exhausting indoors, capacity: 30 pounds of countertops per hour.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour rated at a total of 1.495 million British thermal units per hour, consisting of twenty-three (23) furnaces for building heat, rated 0.065 million British thermal units per hour, each.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.

- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5] [326 IAC 8-3-2]

Existing Approvals

Since the issuance of the first Part 70 Operating Permit Renewal (T053-17618-00032) on November 22, 2006, the source has constructed and has been operating under the following additional approvals:

- (a) Significant Source Modification No. 053-31220-00032 issued on March 5, 2012; and
- (b) Minor Permit Modification No. 053-31255-00032 issued on March 22, 2012.

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

Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit".

On February 24, 2011, the Office of Air Quality (OAC) received a renewal application from Hartson-Kennedy Cabinet Top Company located at 522 W 22nd Street, Marion, IN 46953.

During the review, a discrepancy concerning the number of coating lines described in the application and the number of currently permitted was found. The source subsequently submitted an application for an Administrative Amendment (053-32380-00032) to address the discrepancy.

Based on the information submitted as part of the Part 70 Operating Permit Renewal (053-30261-00032) and an inspection conducted on October 23, 2012, IDEM OAQ issued Hartson-Kennedy Cabinet Top Company an NOV on January 9, 2014.

IDEM is still reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Grant County.

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

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Grant County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Grant County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Grant County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	1421
PM ₁₀	1421

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM _{2.5}	1421
SO ₂	0.004
VOC	853
CO	0.54
NO _x	0.64
GHGs as CO ₂ e	775
Single HAP	Greater than 10
Total HAP	Greater than 25

HAPs	Tons/year
Toluene	222
Hexane	139
Methanol	3
Total	333

The potential to emit (PTE, as defined in 326 IAC 2-7-1(29)) of PM₁₀, PM_{2.5}, and VOC is equal to or greater than 100 tons per year. Also, the PTE of any single HAP is equal to or greater than ten (10) tons per year and the PTE of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Proposed Modification

Description of Proposed Modification

While reviewing Hartson-Kennedy Cabinet Top Company, Inc, the Office of Air Quality (OAQ) has determined that a significant source modification was need to permit the changes in coatings used at the facility. The following is a list of the modified emission units:

- (a) Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, and each approved in 2014 for modification, each equipped with airless spray applicators and dry filters for overspray control.
 - (1) One (1) adhesive spray booth for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle

board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.

- (2) One (1) adhesive spray booth for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.
 - (3) One (1) adhesive spray booth for Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.
- (b) One (1) adhesive spray booth for Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 and 2014 for modification, with a total capacity of 37.5 parts per hour and exhausting through Stack 6.

Source Status Prior to the Modification

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 (ton/yr)
PM	Less than 100
PM ₁₀	Less than 100
PM _{2.5}	Less than 100
SO ₂	Less than 100
VOC	Great than 250
CO	Less than 100
NO _x	Less than 100
GHGs as CO ₂ e	Less than 100,000
Toluene	Great than 10
Total HAPs	Great than 25

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a 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(ff)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, 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).

Permit Level Determination – Part 70

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

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

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Increase from Modification (ton/yr)
PM*	37.01	27.19	0
PM ₁₀ *	37.01	27.19	0
PM _{2.5} *	37.01	27.19	0
SO ₂	-	-	-
NO _x	-	-	-
VOC	767.49	797.73	30.24
CO	-	-	-
Toluene	145.16	159.77	14.61
HAPs	255.37	175.75	0

* PTE for these pollutants takes into account the dry filters as the requirement to operate them for the booths is an existing federally enforceable permit condition.

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the "modification [has] a potential to emit greater than or equal to twenty-five (25) tons per year of VOC. The source modification is also subject to 326 IAC 2-7-10.5(g)(6) because the "modification [has] a potential to emit greater than or equal to ten (10) tons per year of" toluene.

The Part 70 Operating Permit Renewal itself will grant the source the appropriate operating approval for the proposed modification. Therefore, a distinct significant permit modification will not be issued.

Permit Level Determination – PSD

The Permittee has stated that the increase in VOC is due to the change in coating used at the source and not a result of a production change. Additionally, the source has stated that this modification does not debottleneck upstream or downstream processes. The Permittee has stated that this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1.

IDEM, OAQ has not reviewed any additional information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8 and Applicability in 326 IAC 2-3-2.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)										
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs*** (CO ₂ e) 11/29/2013	GHGs*** (CO ₂ e) 10/30/2009	Total HAPs	Worst Single HAP ²
Coating Lines, Wash Area, Flat Panel	27.19	27.19	27.19	-	-	861.88	-	-	-	245.81	229.30
Woodworking Operations (Part 70)	6.67	6.67	6.67	-	-	-	-	-	-	-	-
Woodworking Operations (PSD)	6.67	6.67	6.67	-	-	-	-	-	-	-	-
Soild Surface Line	0.06	0.06	0.06	-	-	-	-	-	-	-	-
Soild Surface Line Operations (PSD)	0.06	0.06	0.06	-	-	-	-	-	-	-	-
Insignificant Activities											
Emergency generator	2.33E-05	9.31E-05	9.31E-05	1.23E-03	7.35E-06	6.74E-05	1.03E-03	1	1	2.31E-05	4.17E-08
Space Heaters	1.22E-02	4.88E-02	4.88E-02	3.85E-03	0.64	3.53E-02	0.54	775	775	1.21E-02	2.18E-05
Power Washer	-	-	-	-	-	0.49	-	-	-	9.72E-04	-
Total PTE of Entire Source (Part 70)	33.93	33.93	33.93	5.08E-03	0.64	862.40	0.54	776	777	245.82	229.30
Total PTE of Entire Source (PSD)	33.93	33.93	33.93	5.08E-03	0.64	862.40	0.54	776	777	245.82	229.30
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	100,000 CO ₂ e	NA	NA
1) PTE of PM/PM ₁₀ /PM _{2.5} is based on compliance with 326 IAC 6-3-2; however, the PTE based on the 326 IAC 6-3-2 limitations is not federally enforceable for purposes of determining Part 70 or 326 IAC 2-2 (PSD) applicability. 2) The worst single HAP is Toluene. *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . *** Green House Gas (GHG) values are given on a basis of CO ₂ equivalent (CO ₂ e) emissions.											

This existing stationary source is major for PSD because the emissions of at least one attainment pollutant are greater than two hundred fifty (>250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

CAM

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and

- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU-1 Two (2) Spray Booths: Line 1, Line 2, Line 4 (PM)	Dry Filters	Y	< 100	< 100	100	N	N
EU-2 Woodworking Operations (CE-1) (PM)	Cyclone and Baghouse	Y	> 100	< 100	100	Y	N
Line 3 Spray Booth (PM)	Dry Filters	Y	< 100	< 100	100	N	N
Cutting & Grinding Operations Solid Surface Line (CE-2) (PM)	Cyclone and Baghouse	Y	< 100	< 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to Woodworking Operations (EU-2) for PM upon issuance of the Title V Renewal. A CAM plan was incorporated into the first Part 70 permit renewal and no changes are required as part of this Part 70 permit renewal.

NSPS

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

NESHAP

- (c) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations (40 CFR Part 63.800, Subpart JJ, which is incorporated by reference as 326 IAC 20-14) because it contains facilities that engage in the manufacturing of wood furniture components, pursuant to the definition of 40 CFR Part 63.801, and are located at a major source of HAPs. The following existing facilities are subject to this rule:
- Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, each equipped with airless spray applicators and dry filters for overspray control.
- (1) One (1) adhesive spray booths for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.

- (2) One (1) adhesive spray booths for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.
 - (3) One (1) adhesive spray booth for Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.
- Three (3) wash areas, collectively identified as EU-3, each with a capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) wash area is associated with each of the following lines:
 - (1) The Main Line (Line 1), installed in 1976.
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.
 - (3) The Etop Line (Line 4) installed in 1976.
 - The Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 for modification, with a total capacity of 37.5 parts per hour and exhausts through Stack 6.

The following new facilities are subject to this rule:

- One (1) wash area associated with the Duraform/Diamond Cut Line (Line 3) installed in 2002, capacity: 2,100 linear feet of wood cabinet tops per hour or 12,785 pounds of particle board and 995 pounds of laminate per hour.
- One (1) adhesive roll coating booth identified as Flat Panel, identified as EU-5, installed in 2002, capacity: 1,280 pounds of particle board per hour and 98 pounds of laminate per hour. This unit is considered a new affected source under 40 CFR 63, Subpart JJ.

The entire rule has been included as Attachment A of the permit. The emission units are subject to the following portions of Subpart JJ:

- (1) 40 CFR 63.800(a), (d), (e), (f), (g)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a)(2)(ii), (a)(3), (a)(4)(ii)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (c)(1), (f)(5), (f)(7), (f)(8), (g)(5), (g)(7), (g)(8), (g)(9), (h)(3)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806 (a), (b), (e), (h), (i), (j), (k)
- (8) 40 CFR 63.807 (a), (b), (c), (e)
- (9) Tables 1, 2, 3, 4, 5, and 6 to Subpart JJ of Part 63

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

- (d) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products (40 CFR Part 63.2230, Subpart DDDD) are not included in this permit because the source does not manufacture plywood

or composite wood products. The source does not meet the definition of a Plywood and composite wood products (PCWP) manufacturing facility since they do not manufacture plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a panel, engineered wood product, or other product defined in §63.2292.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Building Products Surface Coating (40 CFR Part 63.4680, Subpart QQQQ, which are incorporated by reference as 326 IAC 20-79) are not included in the permit for the surface coating operations or wash areas as these emission units are subject to 40 CFR Part 63, Subpart JJ. Pursuant to 40 CFR 63.4681(c)(2), Subpart QQQQ does not apply to surface coating of wood furniture subject to subpart JJ of this part, including finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components. The surface coating of millwork and trim associated with cabinet manufacturing is also subject to subpart JJ and not to subpart QQQQ.
- (f) There are no new or additional NESHAP rules incorporated into this permit since the last renewal permit.

State Rule Applicability - Entire Source

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

The adhesive spray booths, the wood working operations and wash areas associated with the Main Line (Line 1), the Bar/Vanity Line (Line 2), and the Etop (Line 4), were all installed in 1976, prior to the applicability date of the PSD rule. Therefore, these emission units did not undergo PSD review.

The addition of the adhesive roll coating booth Flat Panel, identified as EU-5, and the Duraform/Diamond Cut Line (Line 3), identified as EU-6, in 2002 has the potential to emit VOC, PM and PM₁₀ emissions from this modification were less than the PSD significant levels of forty (40), twenty-five (25) and fifteen (15) tons per year, respectively.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC is greater than 250 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2012 and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

The operation of EU-1, EU-3, EU-4, Line 3 and EU-5 will emit 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; however, pursuant to 326 IAC 2-4.1-1(b)(2), because these units are specifically regulated by NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d) of the CAA, these units are exempt from the requirements of 326 IAC 2-4.1.

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

(a) Surface Coating

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) adhesive spray booths for Main Line (Line 1), Bar/Vanity (Line 2), and Etop Line (Line 4) collectively identified as EU-1, and the adhesive spray booth for Duraform/Diamond Cut Line (Line 3), shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) Woodworking

Pursuant to 326 IAC 6-3-2, the particulate from the woodworking operations associated with the Main Line (Line 1), the Bar/Vanity (Line 2), the Duraform/Diamond Cut (Line 3), and the Etop (Line 4), collectively identified as EU-2, shall be limited to a total of 14.9 pounds per hour operating at a process weight rate of 13,780 pounds per hour.

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

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

The cyclone and baghouse system, identified as CE-1, shall be in operation at all times the four (4) woodworking operations, collectively identified as EU-2, are in operation, in order to comply with this limit.

(c) Cutting and Grinding Operations

Pursuant to 326 IAC 6-3-2(e)(2), the allowable rate of particulate emissions from the cutting and grinding operations (Solid Surface Line) controlled by the AGET cyclone and baghouse system, identified as CE-2, with a process weight rate of 30 pounds of countertops per hour is 0.551 pounds of PM per hour.

The AGET cyclone and baghouse system, identified as CE-2, shall be in operation at all times the cutting and grinding operations are operating in order to comply with this limit.

Furthermore, in order to ensure the AGET cyclone and baghouse system, identified as CE-2, operates properly, compliance monitoring conditions have been added to the permit.

The previous renewal, T053-17618-00032, considered the cutting and grinding operations (Solid Surface Line) to be insignificant activities. However, the uncontrolled potential to emit PM10 of this unit exceeds the exemption levels for insignificant activities, 25 pounds per day or 5.00 tons per year, specified in 326 IAC 2-7-1(21)(E)(vi). Additionally, this unit does not fall into the definition for insignificant controlled woodworking activity. The baghouse used for control must have a grain loading that does not exceed 0.03 grain per dry standard cubic feet. CE-2, the baghouse

used of control on the Solid Surface Line, grain loading is 0.00025 grain per dry standard cubic feet and meets this portion of the definition. In order to be an insignificant activity, the gas flow rate must also not exceed 4,000 acfm. The baghouse used has a gas flow rate of 6,000 acfm. Therefore, the cutting and grinding operation (Solid Surface Line) is not considered an insignificant activity and is included among the permitted emission units.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The surface coating operations and wash off areas, identified as EU-1, EU-3, and EU-4, at this source are not subject to this rule because they were constructed in 1976 and therefore do not meet the applicability date of January 1, 1980 for new facilities.

However, EU-6 and EU-5 do meet the applicability date of 2002, but EU-5 does not emit more than 25 tons or more per year and EU-6 is subject to other provisions of article 8.

Therefore, 326 IAC 8-1-6 does not apply to this source.

326 IAC 8-2-10 (Surface coating emission limitations: Flat wood panels; manufacturing operations)

The requirements of this rule do not apply to any emission units at this source because the source manufactures cabinet tops, which are considered furniture components and are therefore not applicable to this rule pursuant to 326 IAC 8-2-10(b). This section does not apply to coating lines used solely in the manufacture of exterior siding, tileboard, or particleboard used as a furniture component.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

EU-6 and EU-5 were constructed in 2002 in Grant County and are subject to 8-2-12. All coatings shall be applied with an airless spray application system, roll coating or an other system outlined in 326 IAC 8-2-12(b).

The three (3) adhesive spray booths, collectively identified as EU-1, are not subject to the requirements of 326 IAC 8-2-12 since they were constructed in 1976 in Grant County and therefore do not meet the applicability dates stated in 326 IAC 8-2-1 of July 1, 1990.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The surface coating operations and wash off areas, identified as EU-1, EU-3, and EU-4, were all constructed after October 7, 1974 and prior to January 1, 1980 (1976) and are not subject to 326 IAC 8-6, even though the potential VOC emissions from the spray booths exceed one hundred (100) tons per year, because all of the solvents and adhesives used in these operations are exempt from this rule pursuant to 326 IAC 8-6-2(b)(4). The primary constituents of the adhesives and wash off solvent are toluene, hexane and methanol; IAC 326 8-6-2(b)(4)(A) and (B) state that alcohols and aromatic organic solvents are not applicable to this rule.

EU-6 and EU-5 were constructed in 2002 and are not subject to 326 IAC 8-6. This facility is not located in Lake or Marion Counties and was constructed after October 7, 1974 but not prior to January 1, 1980.

326 IAC 8-11 (Wood Furniture Coatings)

The requirements of this rule do not apply to any emission units at this source because the source is not located in Lake, Porter, Clark, or Floyd County.

326 IAC 8-22 (Miscellaneous Industrial Adhesives)

The requirements of this rule do not apply to any spray or roll coating booth using adhesives at this source because the source is not located in Lake or Porter County.

326 IAC 20-14 (Wood Furniture Manufacturing Operations)

The surface coating operations of wood furniture components will be required to comply with the requirements of Wood Furniture Manufacturing Operations in 40 CFR 63.800, Subpart JJ, as described in the "Federal Rule Applicability" section of this TSD.

Insignificant Activities

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

The adhesive roll coating booth Flat Panel Line, identified as EU-5, applies coatings with rolling application methods that do not result in the formation of airborne particulate. Therefore, pursuant to 326 IAC 6-3-1(b)(6), the requirements of 326 IAC 6-3-2 do not apply.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

Flat Panel Line, identified as EU-5, considered an insignificant activity and installed after July 1, 1990, is not subject to the requirements of this rule since the VOC emissions are less than 15 lbs/day. The rule applicability for units constructed after July 1, 1990 shall have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The adhesive used by EU-5 is solid at room temperature and is applied by roll coating (Note: roll coating is a compliant application method for this rule per 326 IAC 8-2-12(b)). The manufacturer of the adhesive verified that using the adhesive results in no VOC and no HAP emissions.

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 and determination requirements applicable to this source are as follows:

- (a) The two (2) adhesive spray booths for Main Line (Line 1), Etop (Line 4) and Bar/Vanity (Line 2), collectively identified as EU-1 and the adhesive spray booth (Duraform/Diamond Cut (Line 3)), identified as EU-6 have the applicable compliance monitoring conditions as specified below:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the adhesive spray booth Stacks 1, 2, 3, 4 and 6 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps.
- (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps
- (3) The Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its daily, weekly, and monthly records when an inspection or observation is not taken and the reason for the lack of inspection or observation (e.g. the process did not operate for that time period).

These monitoring conditions are necessary because the dry filters that control particulate emissions from EU-1 and EU-6 must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

- (b) The four (4) woodworking operations (Main Line (Line 1), Etop (Line 4), Bar/Vanity (Line 2), and Duraform/Diamond Cut (Line 3)), collectively identified as EU-2, have applicable compliance monitoring and compliance determination conditions, specified below, which are part the source's CAM Plan and required by 40 CFR Part 64:
 - (1) The baghouse and cyclone for particulate control shall be in operation and control emissions from the four (4) woodworking operations, (Main Line (Line 1), Etop (Line 4), Bar/ Vanity (Line 2), and Duraform/Diamond Cut (Line 3)), collectively identified as EU-2, at all times that any of the woodworking processes are in operation.
 - (2) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced.
 - (3) Visible Emissions Notations
 - (a) Visible emission notations of the woodworking operations exhaust, Stack 5, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) If abnormal emissions are observed, the Permittee shall take reasonable response steps.
 - (4) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.
 - (5) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut

down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (6) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (7) An inspection shall be performed each calendar quarter of all cyclones controlling woodworking operations.
- (8) For a cyclone 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).
- (9) For a cyclone 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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse and cyclone for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 and 326 IAC 2-7 (Part 70) and 40 CFR 64 (Compliance Assurance Monitoring).

- (c) The cutting and grinding operations (Solid Surface Line), collectively identified as EU-2, have applicable compliance monitoring and compliance determination conditions, specified below:
 - (1) The AGET cyclone and baghouse system for particulate control shall be in operation and control emissions from the cutting and grinding operations (Solid Surface Line) at all times these processes are in operation.
 - (2) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (3) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

These monitoring conditions are necessary because the baghouse and cyclone for the cutting and grinding operations (Solid Surface Line) must operate properly to ensure compliance with 326 IAC 6-3 and 326 IAC 2-7 (Part 70).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. T053-17618-00032. These corrections, changes, and removals may include Title I changes (ex: changes that add or modify synthetic minor emission limits). Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Changes Made Per Sources Request

The following updates or changes to the previous operating permit conditions have been made as part of this Part 70 Operating Permit Renewal:

- (a) **Emission Unit Naming Convention**
The Duraform/Diamond Cut Line (Line 3) was moved on the plant floor and renamed Etop (Line 4). A new insignificant line was constructed with existing parts at the source and named Duraform/Diamond Cut Line (Line 3). Because the source never updated the names in the permit during these changes, the incorrect lines were removed and renamed as part of SSM No. 053-31220-00032. This permit will correct this error. The table below shows the new naming convention:

Year Installed	Existing Name	Unit ID	Exhaust Stack
1976	Main Line	Line 1 (EU-1)	1 and 2
1976	Bar/Vanity Line	Line 2 (EU-1)	3
1976	Etop Line	Line 4 (EU-1)	4
2002	Duraform/Diamond Cut Line	Line 3 (EU-6)	6
2002	Flat Panel	EU-5	-

Furthermore, the description have been updated to make sure there is no further confusion between line names, years installed and the exhaust stacks.

- (b) **Classification of Cutting and Grinding Operations (Solid Surface Line)**
In the previous renewal, the cutting and grinding operations (Solid Surface Line) were included among insignificant activities. After evaluation for this renewal, the cutting and grinding operations (Solid Surface Line) have been removed from insignificant activities and are considered permitted units as these units do not meet the potential to emit criteria for insignificant activities pursuant to 326 IAC 2-7-1(21)(E)(vi).
- (c) **Addition of E.1**
Previously D.1.1 through D.1.3 - National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations Requirements [40 CFR Part 63, Subpart JJ] has been moved to SECTION E.1 FACILITY OPERATION CONDITIONS - 40 CFR 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations. The standard is still applicable to the source. The NESHAP (Subpart JJ), in its entirety, is located in Attachment A.

Summary of Model Updates for Section A, B, and C

IDEM, OAQ has made changes to some of the standard language used throughout the permit to help clarify the intent of the conditions. The following revisions have been made to Sections A, B and C of the permit:

- (a) **Multiple Conditions - Timeframe References**
IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than" except for the timelines in subparagraphs (b)(4) and (b)(5) of Section B - Emergency Provisions and Section B - Annual Fee Payment, in which the underlying rules state "within".
- (b) **Multiple Conditions - Responsible Official References**
326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official".

On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule cite of the "responsible official" definition. The rule citation has been changed throughout the permit.
- (c) **Multiple Conditions - Certification Requirement References**
IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet
- (d) **Multiple Conditions - Branch Name Updates**
Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.
- (e) **Multiple Conditions - Rule Citations**
On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions. The change is only to the citation of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Specifically Regulated Insignificant

Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, Section C - Stack Height, Section C - Risk Management Plan, the Facility Descriptions, and Section D - Preventative Maintenance Plan.

- (f) **Section B - Duty to Provide Information**
IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "responsible official".
- (g) **Section B - Certification**
IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule and to clarify that Section B - Certification only states what a certification must be.
- (h) **Section B - Preventive Maintenance Plan**
IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has also decided to clarify other aspects of Section B - Preventive Maintenance Plan.
- (i) **Section B - Emergency Provisions**
IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
- (j) **Section B - Deviation from Permit Requirements and Section C - General Reporting Requirements**
IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed and the requirements of that condition have been added to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report. Subparagraph (g)(4), which is now (f)(4) of Section C - General Reporting Requirements, has been revised to match the underlying rule language.
- (k) **Section B - Permit Renewal**
IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (l) **Section B - Permit Revision Under Economic Incentives and Other Programs**
IDEM, OAQ has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.
- (m) **Section B - Source Modification Requirement**
IDEM, OAQ has decided to reference 326 IAC 2 in Section B - Source Modification Requirement rather than the specific construction rule.
- (n) **Section C - Opacity**
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (o) **Section C - Incineration**
IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.

- (p) **Section C - Asbestos Abatement Projects**
IDEM, OAQ has revised paragraph (g) of Section C - Asbestos Abatement Projects to match the rule language in 326 IAC 14-10-1(a).
- (q) **Section C - Performance Testing**
IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (r) **Section C - Compliance Monitoring**
IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.
- IDEM, OAQ has also decided to clarify the Permittee's responsibility under CAM.
- IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (s) **Section C - Instrument Specifications**
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (t) **Section C - Monitoring Methods**
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (u) **Section C - Emergency Reduction Plans**
IDEM, OAQ has decided not to list the submission date of the ERP because the ERP can be updated without a permit change.
- (v) **Section C - Response to Excursions or Exceedances**
IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

IDEM, OAQ has also decided to clarify the Permittee's responsibility under CAM.

(w) **Section C - Actions Related to Noncompliance Demonstrated by a Stack Test**
IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

(x) **Section C - Emission Statement**
IDEM, OAQ decided to remove paragraph (b) of Section C - Emission Statement since it was duplicative of the requirement in Section C - General Reporting Requirements.

(y) **Section C - General Record Keeping Requirements**
The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

IDEM, OAQ has also clarified the Permittee's responsibility with regards to record keeping.

On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions included the incorporation of the U.S. EPA's definition of reasonable possibility. The permit previously cited to the EPA definition. Also, the revisions resulted in changes to other rule cites listed in the permit. Neither of these changes are changes to the underlining provisions. The change is only to the citation of these rules in Section C - General Reporting and Section C - General Recordkeeping.

IDEM has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule.

(z) **Section C - General Reporting Requirements**
IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

IDEM, OAQ has also decided to clarify the Permittee's responsibility under CAM.

(aa) **Section C - Compliance with 40 CFR 82 and 326 IAC 22-1**
IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

Descriptive changes to Section A:

- (a) The source requests that the naming convention of the surface coating booths be clarified to include the associated Line number.
- (b) The cutting and grinding operations (Solid Surface Line) have been removed from insignificant activities and are considered permitted units as these units do not meet the potential to emit criteria for insignificant activities pursuant to 326 IAC 2-7-1(21)(E)(vi).
- (c) Previously omitted Insignificant Activities have been included in this renewal.

- (d) Clarification of Section A.3, Insignificant Activities: The explanation for water based adhesives has been clarified to more closely reflect the rule regarding water based adhesives in 326 IAC 2-7-1(21)(ix)(EE).

The permit has been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

- ~~(a) Two (2) adhesive spray booths (Main Line, and 1 Etop/Bar/Vanity, collectively identified as EU-1, each equipped with airless spray applicators and dry filters for overspray control, exhausted to Stacks 1 and 2, and Stack 3, respectively, each installed in 1976, capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour.~~
- ~~(b) Three (3) wash areas (Main Line, Etop/Bar/Vanity and Duraform/Diamond Cut), collectively identified as EU-3, installed in 1976, capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour.~~
- (a) Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, each equipped with airless spray applicators and dry filters for overspray control.**
- (1) One (1) adhesive spray booths for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.**
- (2) One (1) adhesive spray booths for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.**
- (3) One (1) adhesive spray booth called the Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.**
- (b) The Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 for modification, with a total capacity of 37.5 parts per hour and exhausts through Stack 6.**
- (c) Four (4) woodworking operations, collectively identified as EU-2, equipped with a cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) woodworking operations is associated with each of the following lines:**
- (1) The Main Line (Line 1), installed in 1976.**
- (2) The Bar/Vanity Line (Line 2), installed in 1976.**
- (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.**

- (4) The Etop Line (Line 4) installed in 1976.**
- (d) Four (4) wash areas, collectively identified as EU-3, each with a capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) wash area is associated with each of the following lines:**
 - (1) The Main Line (Line 1), installed in 1976.**
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.**
 - (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.**
 - (4) The Etop Line (Line 4), installed in 1976.**
- (ee) One (1) custom area for thinner washoff operations, identified as EU-4, installed in 1976, capacity: 315 linear feet of wood cabinet tops per hour, total.**
- ~~(d) Four (4) woodworking operations, (Main Line, Etop/Bar/Vanity, Duraform/Diamond Cut and Hot Melt Line), collectively identified as EU-2, installed in 1976 and 2002, equipped with a cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour.~~
- ~~(e) One (1) adhesive spray booth (Duraform/Diamond Cut), identified as Line 3, equipped with HVLP applicators and dry filters for overspray control, exhausted to Stack 4, installed in 1976, capacity: 37.5 parts per hour.~~
- (f) Cutting and grinding operations (Solid Surface Line) controlled by the AGET cyclone and baghouse system, identified as CE-2, installed in 2000, exhausting indoors, capacity: 30 pounds of countertops per hour.**

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

- ~~Cutting and grinding operations (Solid Surface Line) controlled by the AGET cyclone and baghouse system, identified as CE-2, installed in 2000, capacity: 30 pounds of countertops per hour (326 IAC 6-3-2).~~
- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour rated at a total of 1.495 million British thermal units per hour, consisting of twenty-three (23) furnaces for building heat, rated 0.065 million British thermal units per hour, each.**
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.**
- (c) Water based adhesives that are less than or equal to five percent (5%) by volume ~~1% by weight~~ of VOCs excluding HAPs.**
- (d) One (1) adhesive roll coating booth Line 5 (formerly identified as Flat Panel or Hot-Melt Line), identified as EU-5, exhausted to Stack 6, installed in 2002, capacity: 1,280 pounds of particle board per hour and 98 pounds of laminate per hour.**

- (e) **Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5] [326 IAC 8-3-2]**

Changes to Section D

IDEM, OAQ has made changes to some of the standard language in conditions in the D Sections of the permit to help clarify the intent of these conditions. The following is a summary of the revisions that have been made to the D Sections of the permit:

- (a) For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligation with regard to the records required by this condition.
- (b) The word "status" has been added to the Record Keeping Requirements and Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- (c) The source requests that the naming convention of the surface coating booths be clarified to include the associated Line number.
- (d) All requirements associated with the NESHAP Subpart JJ have been removed from section D.1 and are now located in Section E.1. The remaining conditions in section D.1 have been renumbered to account for the removed conditions.

The permit has been revised as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(4514)]: Surface Coating Operations

- (a) **Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, each equipped with airless spray applicators and dry filters for overspray control. ~~Two (2) adhesive spray booths (Main Line and Etop/Bar/Vanity), collectively identified as EU-1, each equipped with airless spray applicators and dry filters for overspray control, exhausted to Stacks 1 and 2, and Stack 3, respectively, each installed in 1976, capacity of: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour.~~**
- (1) **One (1) adhesive spray booths for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.**
- (2) **One (1) adhesive spray booths for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.**
- (3) **One (1) adhesive spray booth called the Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.**
- (b) **The Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 for modification, with a total capacity of 37.5 parts per hour and exhausts through Stack 6.**

- (d) Four (4) wash areas, collectively identified as EU-3, each with a capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) wash area is associated with each of the following lines:**
 - (1) The Main Line (Line 1), installed in 1976.**
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.**
 - (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.**
 - (4) The Etop Line (Line 4) installed in 1976.**
- ~~(b) Three (3) wash areas (Main Line, Etop/Bar/Vanity and Duraform/Diamond Cut), collectively identified as EU-3, installed in 1976, capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour.~~
- ~~(ee) One (1) custom area for thinner washoff operations, identified as EU-4, installed in 1976, capacity: 315 linear feet of wood cabinet tops per hour, total.~~
- ~~(e) One (1) adhesive spray booth (Duraform/Diamond Cut), identified as Line 3, equipped with HVLP applicators and dry filters for overspray control, exhausted to Stack 4, installed in 1976, capacity: 37.5 parts per hour.~~

These units are considered existing affected sources under 40 CFR 63, Subpart JJ

...

~~D.1.1 General Provisions Relating to NESHAP (Subpart JJ) [326 IAC 20-1] [40 CFR Part 63, Subpart A]~~

~~Pursuant to 40 CFR 63.800, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for EU-1, EU-3, EU-4 and Line 3 as specified in Appendix A of 40 CFR Part 63, Subpart JJ in accordance with schedule in 40 CFR 63 Subpart JJ.~~

~~D.1.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]~~

- ~~(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of 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; or~~
 - ~~(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or~~
 - ~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or~~~~~~

- ~~(D) — Use a combination of (A), (B), and (C).~~
- ~~(2) — Limit VHAP emissions contact adhesives as follows:~~
 - ~~(A) — For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.~~
 - ~~(B) — For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.~~
 - ~~(C) — Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.~~
- ~~(3) — The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.~~

~~D.1.3 Work Practice Standards [40 CFR 63.803]~~

~~The Permittee of an affected source subject to this subpart shall maintain a written work practice implementation plan. 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.1.41 Particulate [326 IAC 6-3-2(d)]~~

~~Pursuant to 326 IAC 6-3-2(d), particulate from the **three (3) two (2)** adhesive spray booths, collectively identified as EU-1, and Line 3, **identified as EU-6**, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied by EU-6 to wood furniture and cabinets shall utilize one of the following application methods:

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

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

D.1.53 Preventive Maintenance Plan [326 IAC 2-7-5(1312)]

A Preventive Maintenance Plan is required ~~for these facilities for the two (2) adhesive spray booths, collectively identified as EU-1, the three (3) wash areas, collectively identified as EU-3, Line-3 and any the control devices for EU-1 and Line-3.~~ Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

~~There are no compliance determination requirements associated with the facilities in this section.~~

D.1.64 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the adhesive spray booth Stacks 1, 2, 3 and 4 while ~~the associated one or more of the booths is~~ **are** in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

D.1.75 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.2.~~

- ~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~
- ~~(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
- ~~(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.~~
- ~~(4) The VHAP content in weight percent of each thinner used.~~
- ~~(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~
- ~~(b) To document compliance with Condition D.1.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~
- (ae) To document the compliance status with Condition D.1.61, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its daily, weekly, and monthly records when an inspection or observation is not taken and the reason for the lack of inspection or observation (e.g. the process did not operate for that time period).**
- (bd) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition. All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(1445)]: Woodworking Operations

- ~~(d) Four (4) woodworking operations, (Main Line, Etop, /Bar/Vanity, Duraform/Diamond Cut and Hot Melt Line) collectively identified as EU-2, installed in 1976 and 2002, equipped with a cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour.~~
- (c) Four (4) woodworking operations, collectively identified as EU-2, equipped with a cyclone and baghouse system, identified as CE-1, installed in 2003, exhausted to Stack 5, capacity: 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) woodworking operations is associated with each of the following lines:**
 - (1) The Main Line (Line 1), installed in 1976.**
 - (2) The Bar/Vanity Line (Line 2), installed in 1976.**
 - (3) The Duraform/Diamond Cut Line (Line 3), installed in 2002.**
 - (4) The Etop Line (Line 4) installed in 1976.**

...

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the four (4) woodworking operations, (**Main Line (Line 1), Etop (Line 4), Bar/Vanity (Line 2), Duraform/Diamond Cut (Line 3)** ~~Main Line, Etop/Bar/Vanity, Duraform/Diamond Cut and Hot-Melt Line~~), collectively identified as EU-2, shall not exceed 14.9 pounds per hour when operating at a process weight rate of 13,780 pounds per hour.

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(1312)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for the **woodworking operations** ~~at facilities and CE-1, their cyclone and baghouse system control devices.~~ **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.2.3 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to **ensure compliance** ~~comply~~ with Condition D.2.1, the baghouse and cyclone for particulate control shall be in operation and control emissions from the four (4) woodworking operations, (Main Line (**Line 1**), Etop (**Line 4**), ~~Bar/ Vanity (Line 2), and Duraform/Diamond Cut (Line 3) and Hot-Melt Line~~), collectively identified as EU-2, at all times that any of the woodworking processes are in operation.

...

D.2.4 Visible Emissions Notations [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) Visible emission notations of the woodworking operations ~~Stack 5 exhaust,~~ **Stack 5**, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

(e) If abnormal emissions are observed, the Permittee shall ~~a~~ take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.2.5 Baghouse Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations ~~when venting to the atmosphere.~~ A baghouse inspection shall be performed within ~~three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter.~~ **Inspections are optional when venting to the indoors.** All defective bags shall be replaced.

...

D.2.7 Cyclone Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations ~~when venting to the atmosphere.~~ A cyclone inspection shall be performed within ~~three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter.~~ **Inspections are optional when venting to the indoors.**

...

D.2.9 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking operations **exhaust**, Stack 5 ~~exhaust~~. 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, (i.e. the process did not operate that day).
- (b) To document **the compliance status** with Conditions D.2.5 and D.2.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.7.
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

...

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (a) **Three (3) adhesive spray booths, collectively identified as EU-1, each installed in 1976, each equipped with airless spray applicators and dry filters for overspray control.**
 - (1) **One (1) adhesive spray booths for Main Line (Line 1) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour, and exhausting through Stack 1 and 2.**
 - (2) **One (1) adhesive spray booths for Bar/Vanity Line (Line 2) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and exhausts through Stack 3.**
 - (3) **One (1) adhesive spray booth called the Etop Line (Line 4) with a total capacity of: 2,100 linear feet of wood cabinet tops per hour, or 12,785 pounds of particle board and 995 pounds of laminate per hour and that exhausts through Stack 4.**
- (b) **The Duraform/Diamond Cut Line (Line 3), identified as EU-6, constructed in 2002 as an Insignificant Activity and approved in 2012 for modification, with a total capacity of 37.5 parts per hour and exhausts through Stack 6.**
- (c) **Four (4) wash areas, collectively identified as EU-3, each with a capacity: 2,100 linear feet of wood cabinet tops per hour, total, or 12,785 pounds of particle board and 995 pounds of laminate per hour. One (1) wash area is associated with each of the following lines:**
 - (1) **The Main Line (Line 1), installed in 1976.**
 - (2) **The Bar/Vanity Line (Line 2), installed in 1976.**
 - (3) **The Duraform/Diamond Cut Line (Line 3), installed in 2002.**
 - (4) **The Etop Line (Line 4) installed in 1976.**
- (d) **One (1) adhesive roll coating booth identified as Flat Panel, identified as EU-5, installed in 2002, capacity: 1,280 pounds of particle board per hour and 98 pounds of laminate per**

hour.

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

E.1.1 General Provisions Relating to NESHAP JJ [326 IAC 20-1][40 CFR Part 63, Subpart A]

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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations [326 IAC 20-14] [40 CFR Part 63, Subpart JJ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment A) which are incorporated by reference as 326 IAC 20-14 for the surface coating operations:

- (1) 40 CFR 63.800(a), (d), (e), (f), (g)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a)(2)(ii), (a)(3), (a)(4)(ii)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (c)(1), (f)(5), (f)(7), (f)(8), (g)(5), (g)(7), (g)(8), (g)(9), (h)(3)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806 (a), (b), (e), (h), (i), (j), (k)
- (8) 40 CFR 63.807 (a), (b), (c), (e)
- (9) Tables 1, 2, 3, 4, 5, and 6 to Subpart JJ of Part 63

...

Changes specific to Condition D.3

(a) 326 IAC 6-3-2 and C.1 Condition

Revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective on June 12, 2002 and were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Original Condition C.1 – Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour has been revised to remove (a) which contained these requirements, and original Condition D.3.1 – Particulate, which contained these requirements, has been removed.

(b) Compliance Determination, Compliance Monitoring, and Record Keeping

The cutting and grinding operations (Solid Surface Line) require the AGET cyclone and baghouse system to control particulate emissions in order to ensure compliance with condition D.3.1, 326 IAC 6-3-2(e)(2). Therefore, the following conditions have been added to the renewal to ensure and demonstrate compliance with 326 IAC 6-3-2(e)(2): Preventive Maintenance Plan (PMP), Compliance Determination Requirements, and Compliance Monitoring Requirements.

The permit has been revised as follows:

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(1445)]: ~~Insignificant Activities-Cutting and Grinding Operations~~

- (df) Cutting and grinding operations (Solid Surface Line) controlled by the AGET cyclone and baghouse system, identified as CE-2, installed in 2000, **exhausting indoors**, capacity: 30 pounds of countertops per hour (326 IAC 6-3-2).

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

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

D.3.1 Particulate [326 IAC 6-3-2]

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

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the cutting and grinding operations (Solid Surface Line) and CE-2, the AGET cyclone and baghouse system. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~

Compliance Determination Requirements

D.3.3 Particulate Control [326 IAC 2-7-6(6)]

- (a) **In order to ensure compliance with Condition D.3.1, the AGET cyclone and baghouse system for particulate control shall be in operation and control emissions from the cutting and grinding operations (Solid Surface Line) at all times these processes are in operation.**
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

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

D.3.4 Broken or Failed Bag Detection

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

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

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

D.3.5 Cyclone Failure Detection

- (a) For a cyclone 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 cyclone 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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

...

Summary of Model Updates for the forms

The following is a summary of the changes that have been made to the forms at the end of the permit:

- (a) IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.**

- (b) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.**

- (c) The Part 70 Semi-Annual Report For NESHAP Subpart JJ Form has been removed from this permit. The removal of this form does not, in any way, relieve the Permittee from the requirement to submit a semi-annual report or any other requirement pursuant to 40 CFR Part 63, Subpart JJ.**

- (d) The Quarterly Deviation and Compliance Monitoring Report has been revised to clarify the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 053-34492-00032. The staff recommend to the Commissioner that this Part 70 Significant Source Modification be approved.

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

The operation of this stationary cabinet top manufacturing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T053-30261-00032.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Julie Alexander at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Date: February 24, 2011

Uncontrolled Potential to Emit (tons/yr) - Part 70 Determination								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO2e
Coating Lines, Wash Area, Flat Panel	104.57	104.57	104.57	-	-	861.91	-	-
Emergency generator	2.33E-05	9.31E-05	9.31E-05	7.35E-06	1.23E-03	6.74E-05	1.03E-03	1
Space Heaters	1.22E-02	4.88E-02	4.88E-02	3.85E-03	6.42E-01	3.53E-02	5.39E-01	775
Power Washer	-	-	-	-	-	0.49	-	-
Sub-Total (Excludes Emission Units with Integral Devices)	104.58	104.62	104.62	3.86E-03	0.64	862.43	0.54	776
Emission Units with Integral Devices								
Woodworking Operations	6.67	6.67	6.67	-	-	-	-	-
Soild Surface Line	0.06	0.06	0.06	-	-	-	-	-
Total	111.31	111.35	111.35	3.86E-03	0.64	862.43	0.54	776

* PM2.5 listed is direct PM2.5

Note: PM, PM10, and PM2.5 emissions from the woodworking operations and soild surface line operations were calculated after consideration of the controls based on the integral to the process determination.

Uncontrolled Potential to Emit (tons/yr) - PSD and CAM Determinations								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO2e
Sub-Total (Excludes Emission Units with Integral Devices)	104.58	104.62	104.62	3.86E-03	0.64	862.43	0.54	776
Emission Units with Integral Devices								
Woodworking Operations	1,333.97	1,333.97	1,333.97	-	-	-	-	-
Soild Surface Line	11.26	11.26	11.26	-	-	-	-	-
Total	1,449.82	1,449.85	1,449.85	3.86E-03	0.64	862.43	0.54	776

* PM2.5 listed is direct PM2.5

Note: Controls that are integral to the process are not considered for purposes of PSD or CAM

Potential to Emit after Control (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO2
Coating Lines, Wash Area, Flat Panel	27.19	27.19	27.19	-	-	861.91	-	-
Emergency generator	2.33E-05	9.31E-05	9.31E-05	7.35E-06	1.23E-03	6.74E-05	1.03E-03	1
Space Heaters	1.22E-02	4.88E-02	4.88E-02	3.85E-03	6.42E-01	3.53E-02	5.39E-01	775
Power Washer	-	-	-	-	-	0.49	-	-
Woodworking Operations	6.67	6.67	6.67	-	-	-	-	-
Soild Surface Line	0.06	0.06	0.06	-	-	-	-	-
Total	33.93	33.96	33.96	3.86E-03	0.64	862.43	0.54	776

* PM2.5 listed is direct PM2.5

Note: PM, PM10, and PM2.5 emissions from the woodworking operations and soild surface line operations were calculated after consideration of the controls based on the integral to the process determination.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Date: February 24, 2011

Potential to Emit after Issuance (tons/yr) - Part 70 Determination								
Emission Unit	PM	PM10	PM2.5 *	SO₂	NOx	VOC	CO	CO2e
Coating Lines, Wash Area, Flat Panel	27.19	27.19	27.19	-	-	861.91	-	-
Emergency generator	2.33E-05	9.31E-05	9.31E-05	7.35E-06	1.23E-03	6.74E-05	1.03E-03	1
Space Heaters	1.22E-02	4.88E-02	4.88E-02	3.85E-03	6.42E-01	3.53E-02	5.39E-01	775
Power Washer	-	-	-	-	-	0.49	-	-
Sub-Total (Excludes Emission Units with Integral Devices)	27.20	27.24	27.24	3.86E-03	0.64	862.43	0.54	776
Emission Units with Integral Devices								
Woodworking Operations	6.67	6.67	6.67	-	-	-	-	-
Soild Surface Line	0.06	0.06	0.06	-	-	-	-	-
Total	33.93	33.96	33.96	3.86E-03	0.64	862.43	0.54	776

* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Note: PM, PM10, and PM2.5 emissions from the woodworking operations and soild surface line operations were calculated after consideration of the controls based on the integral to the process determination.

Potential to Emit after Issuance (tons/yr) - PSD and CAM								
Emission Unit	PM	PM10	PM2.5 *	SO₂	NOx	VOC	CO	CO2e
Sub-Total (Excludes Emission Units with Integral Devices)	27.20	27.24	27.24	3.86E-03	0.64	862.43	0.54	776
Emission Units with Integral Devices								
Woodworking Operations	6.67	6.67	6.67	-	-	-	-	-
Soild Surface Line	0.06	0.06	0.06	-	-	-	-	-
Total	33.93	33.96	33.96	3.86E-03	0.64	862.43	0.54	776

* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Note: Controls that are integral to the process are not considered for purposes of PSD or CAM

Appendix A: Emission Calculations
HAPs Summary

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Date: February 24, 2011

Uncontrolled Potential to Emit (tons/yr)											
Emission Unit	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Coating Lines, Wash Area, Flat Panel	-	-	-	16.51	229.30	-	-	-	-	-	245.81
Emergency generator	2.57E-08	1.47E-08	9.19E-07	2.21E-05	4.17E-08	6.13E-09	1.35E-08	1.72E-08	4.66E-09	2.57E-08	2.31E-05
Space Heaters	1.35E-05	7.70E-06	4.81E-04	1.16E-02	2.18E-05	3.21E-06	7.06E-06	8.99E-06	2.44E-06	1.35E-05	1.21E-02
Power Washer	-	-	-	-	-	-	-	-	-	-	9.72E-04
Total	1.35E-05	7.72E-06	4.82E-04	16.52	229.30	3.22E-06	7.08E-06	9.00E-06	2.44E-06	1.35E-05	245.82

Potential to Emit after Control (tons/yr)											
Emission Unit	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Coating Lines, Wash Area, Flat Panel	-	-	-	16.51	229.30	-	-	-	-	-	245.81
Emergency generator	2.57E-08	1.47E-08	9.19E-07	2.21E-05	4.17E-08	6.13E-09	1.35E-08	1.72E-08	4.66E-09	2.57E-08	2.31E-05
Space Heaters	1.35E-05	7.70E-06	4.81E-04	1.16E-02	2.18E-05	3.21E-06	7.06E-06	8.99E-06	2.44E-06	1.35E-05	1.21E-02
Power Washer	-	-	-	-	-	-	-	-	-	-	9.72E-04
Total	1.35E-05	7.72E-06	4.82E-04	16.52	229.30	3.22E-06	7.08E-06	9.00E-06	2.44E-06	1.35E-05	245.82

Potential to Emit after Issuance (tons/yr)											
Emission Unit	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Coating Lines, Wash Area, Flat Panel	-	-	-	16.51	229.30	-	-	-	-	-	245.81
Emergency generator	2.57E-08	1.47E-08	9.19E-07	2.21E-05	4.17E-08	6.13E-09	1.35E-08	1.72E-08	4.66E-09	2.57E-08	2.31E-05
Space Heaters	1.35E-05	7.70E-06	4.81E-04	1.16E-02	2.18E-05	3.21E-06	7.06E-06	8.99E-06	2.44E-06	1.35E-05	1.21E-02
Power Washer	-	-	-	-	-	-	-	-	-	-	9.72E-04
Total	1.35E-05	7.72E-06	4.82E-04	16.52	229.30	3.22E-06	7.08E-06	9.00E-06	2.44E-06	1.35E-05	245.82

Note: The Woodworking Operations and Sould Surface Line contains no HAPs.

**Appendix A: Emissions Calculations
Change in VOC Emissions
From Surface Coating Operations**

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011

Spray Booths - 2006 (As Issued under Part 70 Operating Permit Renewal No.: 053-17618-00032)											
Material ID	Material Density (lb/gal)	Water Content (wt%)	Total Volatiles (wt%)	VOC (wt%)	Max Production Rate (parts/hr)	Coating Usage (gal/part)	VOC Content (lbs/gal)	Potential VOC Emission Rate (lbs/hr)	Potential VOC Emission Rate (lbs/day)	Potential VOC Emissions (tons/yr)	VOC Emission Factor (lbs VOC/ part)
Main Line (Line 1)											
Con-Bond 2621	6.60	32.3%	81.00%	48.70%	0.7	25.000	3.21	56.25	1349.96	246.37	80.36
Imperial 585RR Permagrip	6.73	37.0%	82.00%	45.00%	0.7	25.000	3.03	53.00	1271.97	232.13	75.71
Etop/Bar/Vanity Line (Line 2)											
Con-Bond 2621	6.60	32.3%	81.00%	48.70%	0.7	25.000	3.21	56.25	1349.96	246.37	80.36
Imperial 585RR Permagrip	6.73	37.0%	82.00%	45.00%	0.7	25.000	3.03	53.00	1271.97	232.13	75.71
Duraform/Diamond Cut Line (Line 3)											
Con-Bond 2621	6.60	32.3%	81.00%	48.70%	0.7	25.000	3.21	56.25	1349.96	246.37	80.36
Imperial 585RR Permagrip	6.73	37.0%	82.00%	45.00%	0.7	25.000	3.03	53.00	1271.97	232.13	75.71
Total								168.75	4049.89	739.11	
Flat Panel Line (EU-5)											
PurFect Lok 34-107B	8.80	-	-	0.00%	258	0.090	0.00	0.00	0.00	0.00	0.00

Line 1, 2, and 3 makes up EU-1. EU-1 collectively they can coat 2.1 parts/hr. To calculate the PTE of each line, 2.1 parts/hr was evenly divided between the three lines coming up with 0.7 parts/hr. [2.1 parts/hr / 3 Lines = 0.7 parts/hr]

Spray Booths - 2012 (Minor Permit Modification No.: 053-31255-00032)											
Material ID	Material Density (lb/gal)	Water Content (wt%)	Total Volatiles (wt%)	VOC (wt%)	Max Production Rate (parts/hr)	Coating Usage (gal/part)	VOC Content (lbs/gal)	Potential VOC Emission Rate (lbs/hr)	Potential VOC Emission Rate (lbs/day)	Potential VOC Emissions (tons/yr)	VOC Emission Factor (lbs VOC/ part)
Existing Operations (EU-1)											
Main Line (Line 1)											
Con-Bond 2621	6.60	32.3%	81.00%	48.70%	0.7	25.000	3.21	56.25	1349.96	246.37	80.36
Imperial 585RR Permagrip	6.73	37.0%	82.00%	45.00%	0.7	25.000	3.03	53.00	1271.97	232.13	75.71
Bar/Vanity Line (Line 2)											
Con-Bond 2621	6.60	32.3%	81.00%	48.70%	0.7	25.000	3.21	56.25	1349.96	246.37	80.36
Imperial 585RR Permagrip	6.73	37.0%	82.00%	45.00%	0.7	25.000	3.03	53.00	1271.97	232.13	75.71
Etop Line (Line 4)*											
Con-Bond 2621	6.60	32.3%	81.00%	48.70%	0.7	25.000	3.21	56.25	1349.96	246.37	80.36
Imperial 585RR Permagrip	6.73	37.0%	82.00%	45.00%	0.7	25.000	3.03	53.00	1271.97	232.13	75.71
Total								168.75	4049.89	739.11	
Existing Operations (EU-5)											
Flat Panel Line (EU-5)											
PurFect Lok 34-107B	8.80			0.00%	258	0.090	0.00	0.00	0.00	0.00	
Total								0.00	0.00	0.00	
New Booth Permitted under the MPM (EU-6)											
Duraform/Diamond Cut Line 3 (EU-6)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	37.5	0.036	4.80	6.48	155.52	28.38	0.17

Emission calculated as part of Title V Minor Permit Modification No 053-31255-00032, issued on March 22, 2012.

The Duraform/Diamond Cut Line (Line 3) was moved on the plant floor and renamed Etop (Line 4). A new insignificant line was constructed with existing parts at the source and named Duraform/Diamond Cut Line (Line 3). Because the source never updated the names in the permit during these changes, the incorrect lines were renamed. EU-1 is now made up of Line 1, 2, and 4.

Spray Booths - Upon Issuance of Part 70 Operating Permit No. 053-30261-00032											
Material ID	Material Density (lb/gal)	Water Content (wt%)	Total Volatiles (wt%)	VOC (wt%)	Max Production Rate (parts/hr)	Coating Usage (gal/part)	VOC Content (lbs/gal)	Potential VOC Emission Rate (lbs/hr)	Potential VOC Emission Rate (lbs/day)	Potential VOC Emissions (tons/yr)	VOC Emission Factor (lbs VOC/ part)
EU-1											
Main Line (Line 1)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	120	0.144	4.80	82.95	1990.71	363.30	0.69
Bar/Vanity Line (Line 2)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	50	0.144	4.80	34.56	829.46	151.38	0.69
Etop Line (Line 4)*											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	81.25	0.144	4.80	56.16	1347.87	245.99	0.69
Total								173.67	4168.04	760.67	
EU-6											
Duraform/Diamond Cut Line 3 (EU-6)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	37.5	0.046	4.80	8.28	198.72	36.27	0.22
Total								8.28	198.72	36.27	
EU-5											
Flat Panel Line (EU-5)											
Wilsonart 3100 Adhesive	9.59			0.08%	258	0.090	7.79E-03	0.18	4.34	0.79	

The 2014 calculation contains the most up to date information the source has provided to IDEM and is the current PTE of EU-1, EU-5 and EU-6.

The source submitted updated production rates as part of renewal calculations. The PTE of each line has been updated to show the true production rates and new coating.

**Appendix A: Emissions Calculations
Change in Particulate Emissions
From Surface Coating Operations**

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011

Spray Booths - 2006 (As Issued under Part 70 Operating Permit Renewal No.: 053-17618-00032)										
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Solids Content (wt%)	Transfer Efficiency	Control Efficiency	Potential PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Potential PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)
Main Line (Line 1)										
Con-Bond 2621	6.60	0.7	25.000	19.00%	75%	50%	5.49	24.03	2.74	12.01
Imperial 585RR Permagrip	6.73	0.7	25.000	18.00%	75%	50%	5.30	23.21	2.65	11.61
Bar/Vanity Line (Line 2)										
Con-Bond 2621	6.60	0.7	25.000	19.00%	75%	50%	5.49	24.03	2.74	12.01
Imperial 585RR Permagrip	6.73	0.7	25.000	18.00%	75%	50%	5.30	23.21	2.65	11.61
Duraform/Diamond Cut Line (Line 3)										
Con-Bond 2621	6.60	0.7	25.000	19.00%	75%	50%	5.49	24.03	2.74	12.01
Imperial 585RR Permagrip	6.73	0.7	25.000	18.00%	75%	50%	5.30	23.21	2.65	11.61
Total							16.46	72.09	8.23	36.04

Emission calculated as part of Title V Permit No 053-17618-00032, issued on November 22, 2006.

Line 1, 2, and 3 makes up EU-1. EU-1 collectively they can coat 2.1 parts/hr. To calculate the PTE of each line, 2.1 parts/hr was evenly divided between the three lines coming up with 0.7 parts/hr. [2.1 parts/hr / 3 Lines = 0.7 parts/hr]

Spray Booths - 2012 (Minor Permit Modification NO.: 053-31255-00032)											
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Solids Content (wt%)	Transfer Efficiency	Type of Particulate Control	Control Efficiency	Potential PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Potential PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)
Existing Operations (EU-1)											
Main Line (Line 1)											
Con-Bond 2621	6.60	0.7	25.000	19.00%	75%	Dry Filters	50%	5.49	24.03	2.74	12.01
Imperial 585RR Permagrip	6.73	0.7	25.000	18.00%	75%		50%	5.30	23.21	2.65	11.61
Bar/Vanity Line (Line 2)											
Con-Bond 2621	6.60	0.7	25.000	19.00%	75%	Dry Filters	50%	5.49	24.03	2.74	12.01
Imperial 585RR Permagrip	6.73	0.7	25.000	18.00%	75%		50%	5.30	23.21	2.65	11.61
Etop Line (Line 4)*											
Con-Bond 2621	6.60	0.7	25.000	19.00%	75%	Dry Filters	50%	5.49	24.03	2.74	12.01
Imperial 585RR Permagrip	6.73	0.7	25.000	18.00%	75%		50%	5.30	23.21	2.65	11.61
Total							16.46	72.09	8.23	36.04	
New Booth Permitted under the MPM (EU-6)											
Duraform/Diamond Cut Line (Line 3)											
Wilsonart 844 Adhesive	6.63	37.5	0.036	19.00%	50%	1" Fiberglass Filter	74%	0.85	3.72	0.22	0.97

Emission calculated as part of Title V Minor Permit Modification No 053-31255-00032, issued on March 22, 2012.

The Duraform/Diamond Cut Line (Line 3) was moved on the plant floor and renamed Etop (Line 4). A new insignificant line was constructed with existing parts at the source and named Duraform/Diamond Cut Line (Line 3). Because the source never updated the names in the permit during these changes, the incorrect lines were renamed. EU-1 is now made up of Line 1, 2, and 4.

Spray Booths - Upon Issuance of Part 70 Operating Permit No. 053-30261-00032											
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Solids Content (wt%)	Transfer Efficiency	Type of Particulate Control	Control Efficiency	Potential PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Potential PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)
EU-1											
Main Line (Line 1)											
Wilsonart 844 Adhesive	6.63	120	0.144	19.00%	50%	1" Fiberglass Filter	74%	10.88	47.67	2.83	12.39
Bar/Vanity Line (Line 2)											
Wilsonart 844 Adhesive	6.63	50	0.144	19.00%	50%	1" Fiberglass Filter	74%	4.53	19.86	1.18	5.16
Etop Line (Line 4)*											
Wilsonart 844 Adhesive	6.63	81.25	0.144	19.00%	50%	1" Fiberglass Filter	74%	7.37	32.28	1.92	8.39
Total							22.79	99.81	5.92	25.95	
EU-6											
Duraform/Diamond Cut Line (Line 3)											
Wilsonart 844 Adhesive	6.63	37.5	0.046	19.00%	50%	1" Fiberglass Filter	74%	1.09	4.76	0.28	1.24

The 2014 calculation contains the most up to date information the source has provided to IDEM and is the current PTE of EU-1, EU-5 and EU-6. EU-5 has no PM/PM₁₀/PM_{2.5} emissions.

The source submitted updated production rates as part of renewal calculations. The PTE of each line has been updated to show the true production rates and new coating.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011

Spray Booths - 2006 (As Issued under Part 70 Operating Permit Renewal No.: 053-17618-00032)										
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Max Toluene (wt%)	Max n-Hexane (wt%)	Max MEK (wt%)	Potential Toluene Emission Rate (tons/yr)	Potential Hexane Emission Rate (tons/yr)	Potential MEK Emission Rate (tons/yr)	Total Potential HAP Emissions (tons/yr)
Main Line (Line 1)										
Con-Bond 2621	6.60	0.7	25.000	0.1%	9.1%	7.2%	0.51	46.04	36.42	82.97
Imperial 585RR Permagraph	6.73	0.7	25.000	9.0%	7.0%	0.0%	46.43	36.11	0.00	82.54
Bar/Vanity Line (Line 2)										
Con-Bond 2621	6.60	0.7	25.000	0.1%	9.1%	7.2%	0.51	46.04	36.42	82.97
Imperial 585RR Permagraph	6.73	0.7	25.000	9.0%	7.0%	0.0%	46.43	36.11	0.00	82.54
Duraform/Diamond Cut Line (Line 3)										
Con-Bond 2621	6.60	0.7	25.000	0.1%	9.1%	7.2%	0.51	46.04	36.42	82.97
Imperial 585RR Permagraph	6.73	0.7	25.000	9.0%	7.0%	0.0%	46.43	36.11	0.00	82.54
Total							139.28	138.11	109.27	248.90

Emission calculated as part of Title V Permit No 053-9497-00032, issued on May 26, 1999.

Line 1, 2, and 3 makes up EU-1. EU-1 collectively they can coat 2.1 parts/hr. To calculate the PTE of each line, 2.1 parts/hr was evenly divided between the three lines coming up with 0.7 parts/hr. [2.1 parts/hr / 3 Lines = 0.7 parts/hr]

Spray Booths - 2012 (Minor Permit Modification NO.: 053-31255-00032)																	
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Max Toluene (wt%)	Toluene content (lbs/gal)	Potential Toluene Emission Rate (lbs/hr)	Potential Toluene Emission Rate (tons/yr)	Max n-Hexane (wt%)	n-Hexane content (lbs/gal)	Potential Hexane Emission Rate (lbs/hr)	Potential Hexane Emission Rate (tons/yr)	Max MEK (wt%)	MEK content (lbs/gal)	Potential MEK Emission Rate (lbs/hr)	Potential MEK Emission Rate (tons/yr)	Total Potential HAP Emissions (lbs/hr)	Total Potential HAP Emissions (tons/yr)
Existing Operations (EU-1)																	
Main Line (Line 1)																	
Con-Bond 2621	6.60	0.7	25.000	0.1%	0.01	0.12	0.51	9.1%	0.60	10.51	46.04	7.2%	0.48	8.32	36.42	18.94	82.97
Imperial 585RR Permagraph	6.73	0.7	25.000	9.0%	0.61	10.60	46.43	7.0%	0.47	8.24	36.11	0.0%	0.00	0.00	0.00	18.84	82.54
Bar/Vanity Line (Line 2)																	
Con-Bond 2621	6.60	0.7	25.000	0.1%	0.01	0.12	0.51	9.1%	0.60	10.51	46.04	7.2%	0.48	8.32	36.42	18.94	82.97
Imperial 585RR Permagraph	6.73	0.7	25.000	9.0%	0.61	10.60	46.43	7.0%	0.47	8.24	36.11	0.0%	0.00	0.00	0.00	18.84	82.54
Etop Line (Line 4)*																	
Con-Bond 2621	6.60	0.7	25.000	0.1%	0.01	0.12	0.51	9.1%	0.60	10.51	46.04	7.2%	0.48	8.32	36.42	18.94	82.97
Imperial 585RR Permagraph	6.73	0.7	25.000	9.0%	0.61	10.60	46.43	7.0%	0.47	8.24	36.11	0.0%	0.00	0.00	0.00	18.84	82.54
Total						31.80	139.28	-	-	31.53	138.11	-	-	24.95	109.27	56.83	248.90
New Booth Permitted under the MPM (EU-6)																	
Duraform/Diamond Cut Line 3 (EU-6)																	
Wilsonart 844 Adhesive	6.63	37.5	0.036	15.0%	0.99	1.34	5.88	1.5%	0.10	0.13	0.59	-	-	-	-	1.48	6.47
Total						1.34	5.88	0.02	0.10	0.13	0.59	-	-	-	-	1.48	6.47

Emission calculated as part of Title V Minor Permit Modification No 053-31255-00032, issued on March 22, 2012.

The Duraform/Diamond Cut Line (Line 3) was moved on the plant floor and renamed Etop (Line 4). A new insignificant line was constructed with existing parts at the source and named Duraform/Diamond Cut Line (Line 3). Because the source never updated the names in the permit during these changes, the incorrect lines were renamed. EU-1 is now made up of Line 1, 2, and 4.

Spray Booths - Upon Issuance of Part 70 Operating Permit No. 053-30261-00032													
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Max Toluene (wt%)	Toluene content (lbs/gal)	Potential Toluene Emission Rate (lbs/hr)	Potential Toluene Emission Rate (tons/yr)	Max n-Hexane (wt%)	n-Hexane content (lbs/gal)	Potential Hexane Emission Rate (lbs/hr)	Potential Hexane Emission Rate (tons/yr)	Total Potential HAP Emissions (lbs/hr)	Total Potential HAP Emissions (tons/yr)
EU-1													
Main Line (Line 1)													
Wilsonart 844 Adhesive	6.63	120	0.144	15.0%	0.99	17.18	75.27	1.5%	0.10	1.72	7.53	18.90	82.80
Bar/Vanity Line (Line 2)													
Wilsonart 844 Adhesive	6.63	50	0.046	15.0%	0.99	2.29	10.02	1.5%	0.10	0.23	1.00	2.52	11.02
Etop Line (Line 4)*													
Wilsonart 844 Adhesive	6.63	81.25	0.144	15.0%	0.99	11.64	50.96	1.5%	0.10	1.16	5.10	12.80	56.06
Total						31.11	136.25	-	-	3.11	13.63	34.22	149.88
EU-6													
Duraform/Diamond Cut Line 3 (EU-6)													
Wilsonart 844 Adhesive	6.63	37.5	0.144	15.0%	0.99	5.37	23.52	1.5%	0.10	0.54	2.35	5.91	25.87

The 2014 calculation contains the most up to date information the source has provided to IDEM and is the current PTE of EU-1, EU-5 and EU-6. EU-5 has no HAP emissions.

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

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011

Spray Booths											
Material ID	Material Density (lb/gal)	Water Content (wt%)	Total Volatiles (wt%)	VOC (wt%)	Max Production Rate (parts/hr)	Coating Usage (gal/part)	VOC Content (lbs/gal)	Potential VOC Emission Rate (lbs/hr)	Potential VOC Emission Rate (lbs/day)	Potential VOC Emissions (tons/yr)	VOC Emission Factor (lbs VOC/ part)
Main Line (Line 1)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	120	0.144	4.80	82.95	1990.71	363.30	0.69
Bar/Vanity Line (Line 2)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	50	0.144	4.80	34.56	829.46	151.38	0.69
Duraform/Diamond Cut Line (Line 3)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	37.5	0.046	4.80	8.28	198.72	36.27	0.22
Etop Line (Line 4)											
Wilsonart 844 Adhesive	6.63	0.0%	81.00%	72.40%	81.25	0.144	4.80	56.16	1347.87	245.99	0.69
Flat Panel Line (EU-5)											
Wilsonart 3100 Adhesive	9.59			0.08%	258	0.090	7.79E-03	0.18	4.34	0.79	
Total								182.13	4371.11	797.73	

Washoff Operations											
Material ID	Material Density (lb/gal)	Water Content (wt%)	Total Volatiles (wt%)	VOC (wt%)	Max Production Rate (parts/hr)	Coating Usage (gal/part)	VOC Content (lbs/gal)	Potential VOC Emission Rate (lbs/hr)	Potential VOC Emission Rate (lbs/day)	Potential VOC Emissions (tons/yr)	VOC Emission Factor (lbs VOC/ part)
Main Line (Line 1)											
Toluene for Washoff	7.25	0.0%	100.00%	100.00%	120	0.007	7.25	6.09	146.16	26.67	0.05
Bar/Vanity Line (Line 2)											
Toluene for Washoff	7.25	0.0%	100.00%	100.00%	50	0.007	7.25	2.54	60.90	11.11	0.05
Duraform/Diamond Cut Line (Line 3)											
Toluene for Washoff	7.25	0.0%	100.00%	100.00%	37.5	0.007	7.25	1.90	45.68	8.34	0.05
Etop Line (Line 4)											
Toluene for Washoff	7.25	0.0%	100.00%	100.00%	81.25	0.007	7.25	4.12	98.96	18.06	0.05
Total								14.65	351.70	64.18	

Methodology

The manufacturer of Wilsonart 3100 Adhesive verified that the VOC content of the adhesive (Applied by roll coating and not sprayed) is 0.08125% VOC by weight (Calculated using SCAQMD Rule 1168(b)(49)) and resulting in 0.0076375 pounds of VOC per gallon of adhesive.

VOC Emission Factor (lbs/part) = Max Coating Usage (gal/part) x VOC Content (lbs/gal)

Potential VOC Emission Rate (lbs/hr) = Maximum Production Rate (parts/hr) x Max Coating Usage (gal/part) x VOC Content (lbs/gal)

Potential VOC Emissions (tons/yr) = Potential VOC Emission Rate (lbs/hr) x 8760 (hrs/yr) x 1 ton / 2000 lbs

Coating rate is 1.4 grams/ft². Largest part is 145" x 49" or 49.3403 ft².

Both the board and plastic are sprayed, so total area sprayed is multiplied by 2.

45.3125 ft² x 2 = 90.625 ft² total surface sprayed per part.

1.4 g/ft² x 1 lb/453.5924 g x 1 gal/6.63 lbs = 0.000466 gal/ft²

0.000466 gal/ft² x 98.680 ft²/part = 0.046 gal/part

Filter efficiency of 74% is based on product literature.

Transfer efficiency is assumed to be 50% based on that being the low end of transfer efficiencies for HVLP spray systems.

For purposes of this application, PM is assumed to equal PM₁₀.

Projected actual emissions post-change are based on estimates of 90 pieces/day and 260 days/year.

Coating usage per part for lines 1,2,4 based upon 25 gal used per 2,100 lin ft. Usage = .0119 gal/ft

Multiply this by the largest dimension of the parts (145"/12 in per foot) gives 0.144 gal/ft²

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

**Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011**

Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Solids Content (wt%)	Transfer Efficiency	Type of Particulate Control	Control Efficiency	Potential PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Potential PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Controlled PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)	Uncontrolled PM/PM ₁₀ /PM _{2.5} Emission Factor (lbs PM/ part)	Controlled PM/PM ₁₀ /PM _{2.5} Emission Factor (lbs PM/ part)
Main Line (Line 1)													
Wilsonart 844 Adhesive	6.63	120	0.144	19.00%	50%	1" Fiberglass Filter	74%	10.88	47.67	2.83	12.39	0.091	0.0236
Bar/Vanity Line (Line 2)													
Wilsonart 844 Adhesive	6.63	50	0.144	19.00%	50%	1" Fiberglass Filter	74%	4.53	19.86	1.18	5.16	0.091	0.0236
Duraform/Diamond Cut Line (Line 3)													
Wilsonart 844 Adhesive	6.63	37.5	0.046	19.00%	50%	1" Fiberglass Filter	74%	1.09	4.76	0.28	1.24	0.029	0.0075
Etop Line (Line 4)													
Wilsonart 844 Adhesive	6.63	81.25	0.144	19.00%	50%	1" Fiberglass Filter	74%	7.37	32.28	1.92	8.39	0.091	0.0236
Total								23.87	104.57	6.21	27.19	0.30	0.08

Methodology

PM Emission Factor (lbs/part) = Max Coating Usage (gal/part) x Product Density (lbs/gal) x (Solids Content (wt%)) x (1 - Transfer Efficiency)
 Potential PM Emissions (lbs/hr) = Max Production Rate (parts/hr) x Max Coating Usage (gal/part) x Product Density (lbs/gal) x (Solids Content (wt%)) x (1 - Transfer Efficiency)
 Potential PM Emissions (tons/yr) = Potential PM Emission Rate (lbs/hr) x 8760 (hrs/yr) x 1 ton / 2000 lbs
 Controlled PM Emission Factor (lbs/part) = PM Emission Factor (lbs/part) * (1 - Control Efficiency)
 Controlled PM Emissions (lbs/hr) = Potential PM Emission Rate (lbs/hr) * (1 - Control Efficiency)
 Controlled PM Emissions (tons/yr) = Controlled PM Emissions (lbs/hr) x 8760 (hrs/yr) x 1 ton / 2000 lbs
 Coating rate is 1.4 grams/ft². Largest part is 145" x 49" or 49,3403 ft².
 Both the board and plastic are sprayed, so total area sprayed is multiplied by 2.
 45.3125 ft² x 2 = 90.625 ft² total surface sprayed per part.
 1.4 g/ft² x 1 lb/453.5924 g x 1 gal/6.63 lbs = 0.000466 gal/ft²
 0.000466 gal/ft² x 98.680 ft²/part = 0.046 gal/part
 Filter efficiency of 74% is based on product literature.
 Transfer efficiency is assumed to be 50% based on that being the low end of transfer efficiencies for HVLP spray systems.
 For purposes of this application, PM is assumed to equal PM₁₀.
 Projected actual emissions post-change are based on estimates of 90 pieces/day and 260 days/year.
 Coating usage per part for lines 1,2,4 based upon 25 gal used per 2,100 lin ft. Usage = .0119 gal/ft
 Multiply this by the largest dimension of the parts (145"/12 in per foot) gives 0.144 gal/ft²

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

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011

Spray Booths															
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Max Toluene (wt%)	Toluene content (lbs/gal)	Potential Toluene Emission Rate (lbs/hr)	Potential Toluene Emission Rate (tons/yr)	Max n-Hexane (wt%)	n-Hexane content (lbs/gal)	Potential Hexane Emission Rate (lbs/hr)	Potential Hexane Emission Rate (tons/yr)	Total Potential HAP Emissions (lbs/hr)	Total Potential HAP Emissions (tons/yr)	Single Worst-Case HAP Emission Factor (lbs HAP/ part)	Total HAP Emission Factor (lbs HAP/ part)
Line 1 (Main Line)															
Wilsonart 844 Adhesive	6.63	120	0.144	15.0%	0.99	17.18	75.27	1.5%	0.10	1.72	7.53	18.90	82.80	1.43E-01	1.58E-01
Line 4 (Etop Line)															
Wilsonart 844 Adhesive	6.63	81.25	0.144	15.0%	0.99	11.64	50.96	1.5%	0.10	1.16	5.10	12.80	56.06	1.43E-01	1.58E-01
Line 2 (Bar/Vanity Line)															
Wilsonart 844 Adhesive	6.63	50	0.144	15.0%	0.99	7.16	31.36	1.5%	0.10	0.72	3.14	7.88	34.50	1.43E-01	1.58E-01
Line 3															
Wilsonart 844 Adhesive	6.63	37.5	0.046	15.0%	0.99	1.72	7.51	1.5%	0.10	0.17	0.75	1.89	8.27	4.57E-02	5.03E-02
Flat Panel Line (EU-5)															
Wilsonart 3100 Adhesive	9.59	258	0.090	0.0%	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total						37.70	165.11	-	-	3.77	16.51	41.47	181.62		

Washoff Operations											
Material ID	Material Density (lb/gal)	Max Production Rate (parts/hr)	Max Coating Usage (gal/part)	Max Toluene (wt%)	Toluene content (lbs/gal)	Potential Toluene Emission Rate (lbs/hr)	Potential Toluene Emission Rate (tons/yr)	Total Potential HAP Emissions (lbs/hr)	Total Potential HAP Emissions (tons/yr)	Single Worst-Case HAP Emission Factor (lbs HAP/ part)	Total HAP Emission Factor (lbs HAP/ part)
Line 1 (Main Line)											
Toluene for Washoff	7.25	120	0.007	15.0%	7.25	6.09	26.67	6.09	26.67	5.08E-02	5.08E-02
Line 4 (Etop Line)											
Toluene for Washoff	7.25	81.25	0.007	15.0%	7.25	4.12	18.06	4.12	18.06	5.08E-02	5.08E-02
Line 2 (Bar/Vanity Line)											
Toluene for Washoff	7.25	50	0.007	15.0%	7.25	2.54	11.11	2.54	11.11	5.08E-02	5.08E-02
Line 3											
Toluene for Washoff	7.25	37.5	0.007	15.0%	7.25	1.90	8.34	1.90	8.34	5.08E-02	5.08E-02
Total						14.65	64.18	14.65	64.18		

Methodology

HAP Emission Factor (lbs/part) = Max Coating Usage (gal/part) x HAP Content (lbs/gal)
 Potential HAP Emission Rate (lbs/hr) = Maximum Production Rate (parts/hr) x Max Coating Usage (gal/part) x HAP Content (lbs/gal)
 Potential HAP Emissions (tons/yr) = Potential HAP Emission Rate (lbs/hr) x 8760 (hrs/yr) x 1 ton / 2000 lbs
 Coating rate is 1.4 grams/ft². Largest part is 145" x 49" or 49.3403 ft².
 Both the board and plastic are sprayed, so total area sprayed is multiplied by 2.
 45.3125 ft² x 2 = 90.625 ft² total surface sprayed per part.
 1.4 g/ft² x 1 lb/453.5924 g x 1 gal/6.63 lbs = 0.000466 gal/ft²
 0.000466 gal/ft² x 98.680 ft²/part = 0.046 gal/part
 Filter efficiency of 74% is based on product literature.
 Transfer efficiency is assumed to be 50% based on that being the low end of transfer efficiencies for HVLP spray systems.
 For purposes of this application, PM is assumed to equal PM₁₀.
 Projected actual emissions post-change are based on estimates of 90 pieces/day and 260 days/year.
 Coating usage per part for lines 1,2,4 based upon 25 gal used per 2,100 lin ft. Usage = .0119 gal/ft
 Multiply this by the largest dimension of the parts (145"/12 in per foot) gives 0.144 gal/ft²

Appendix A: Emission Calculations
Particulate Emissions: Baghouse Operations

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011

Units	Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM/PM10/PM2.5 Emission Rate before Controls (lbs/hr)	PM/PM10/PM2.5 Emission Rate before Controls (tons/yr)	PM/PM10/PM2.5 Emission Rate after Controls (lbs/hr)	PM/PM10/PM2.5 Emission Rate after Controls (tons/yr)
Woodworking	EU-2	99.50%	0.0030	59220.0	304.6	1334.0	1.52	6.67
Control Eff. Required to Comply with 326 IAC 6-3-2		95.1%					14.92	65.36
Solid Surface Line	CE-2	99.50%	0.00025	6,000.0	2.57	11.3	0.01	0.06
Control Eff. Required to Comply with 326 IAC 6-3-2		78.6%					0.550	2.41

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lbs)
Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lbs)

	Allowable Rate of Emissions		
	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
Cyclone/Baghouse System - CE-1	13780	6.89	14.9
AGET Cyclone/Baghouse System - CE-2	30	0.02	0.551

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^0.67

**Appendix A: Emissions Calculations
Natural Gas Combustion: Space Heaters
MM BTU/HR <100**

**Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Date: February 24, 2011**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.495	1020	12.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.0122	0.0488	0.0488	0.0039	0.6420	0.0353	0.5393

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.348E-05	7.704E-06	4.815E-04	1.156E-02	2.183E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.210E-06	7.062E-06	8.988E-06	2.439E-06	1.348E-05

Total HAPs: 1.212E-02

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	770	0.015	0.014
Summed Potential Emissions in tons/yr	770		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	775		

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

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

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

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations
Natural Gas Combustion: Space Heaters
MM BTU/HR <100**

**Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Date: February 24, 2011**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.050	1020	2.45E-02

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	2.33E-05	9.31E-05	9.31E-05	7.35E-06	1.23E-03	6.74E-05	1.03E-03

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.57E-08	1.47E-08	9.19E-07	2.21E-05	4.17E-08

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.13E-09	1.35E-08	1.72E-08	4.66E-09	2.57E-08

Total HAPs: 2.31E-05

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1.47E+00	2.82E-05	2.70E-05
Summed Potential Emissions in tons/yr	1.47E+00		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	1		

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations
Insignificant Degreaser**

Company Name: Hartson-Kennedy Cabinet Top Company, Inc.
Address City IN Zip: 522 West 22nd Street, Marion, IN 46953
Permit Renewal No.: T 053-30261-00032
Significant Source Modification No.: 053-34492-00032
Reviewer: Julie Alexander
Application Date: February 24, 2011

In order for the degreaser to qualify as an insignificant activity under the listing in 326 IAC 2-7-1(21)(J)(vi)(DD), the source shall use solvents "the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months". Based on a review of the solvents most widely supplied for the industry by Crystal Clean and Safety-Kleen, the following PTE is based on the following conservative estimates:
 The solvent has a maximum density of 6.7 lb/gal.
 The solvent used in the degreaser contains 100% VOC and up to 0.2% HAP (tetrachloroethylene).
 Utilized MSDS for Safety-Kleen 105 Recycled Solvent as worse case HAP content: <http://www.safety-kleen.com/msds/82310rev8-21-09.pdf>

Uncontrolled Potential Emissions

6.7	lb/gal x	100	% VOC x	145	gal/yr ÷	2000	lb/ton =	0.49	tons VOC per year
				0.49	tpy VOC x	0.2	% HAP =	0.001	tons HAP per year



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Russ Gerber
Hartson-Kennedy Cabinet Top Company, Inc.
522 W 22nd Street
Marion, IN 46953-2926

DATE: July 28, 2014

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Part 70 Operating Permit Renewal
053-30261-00032

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Chris Kennedy, Responsible Official
Julie Delp/Adam Estes, Cornerstone Environmental
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 28, 2014

TO: Marion Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Hartson-Kennedy Cabinet Top Company, Inc.
Permit Number: 053-30261-00032

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	PWAY 7/28/2014 Hartson-Kennedy Cabinet Top Company, Inc 053-30261-00032 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Adam Estes Cornerstone Environmental 880 Lennox Court Zionsville IN 46077 (Consultant)										
3		Julip Delp Cornerstone Environmental 880 Lennox Court Zionsville In 46077-3559 (Consultant)										
4		Russ Gerber Hartson-Kennedy Cabinet Top Company, Inc 522 W 22nd St Marion IN 46953-2926 (Source CAATS)										
5		Chris Kennedy Hartson-Kennedy Cabinet Top Company, Inc 522 W 22nd St Marion IN 46953-2926 (RO CAATS)										
6		Marion City Council and Mayors Office 301 S. Branson Street Marion IN 46952-4052 (Local Official)										
7		Grant County Commissioners 401 South Adams Marion IN 46953 (Local Official)										
8		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
9		Grant County Health Department 401 S. Adams St, Courthouse Complex Marion IN 46953-2031 (Health Department)										
10		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
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