



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

To: Interested Parties

Date: July 26, 2016

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

Source Name: Kountry Wood Products LLC

Permit Level: Title V Operating Permit Renewal

Permit Number: 039-36432-00518

Source Location: 500 E Wabash Nappanee, IN 46550

Type of Action Taken: Permit Renewal

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 36432.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Kountry Wood Products, LLC
500 E. Wabash Avenue
Nappanee, Indiana 46550**

(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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions

Operation Permit No. T039-36432-00518	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 26, 2016 Expiration Date: July 26, 2021

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**Attachment A: National Emission Standards for Hazardous Air Pollutants for Wood
Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]**

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood processing and finishing plant (kitchen cabinet manufacturing).

Source Address:	500 E. Wabash Avenue, Nappanee, Indiana 46550
General Source Phone Number:	(574) 773-5673
SIC Code:	2434
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) surface coating spray booth, identified as Spray Booth 2, constructed in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes. Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered part of the new affected source.

- (b) One (1) automated cabinet finishing line, constructed in 2006, including the following equipment:
- (1) One (1) stain line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
- (A) One (1) infra red pre-heater exhausting through stack SL1;
 - (B) One (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
 - (C) One (1) stain wipe machine, exhausting through Stack SL3; and
 - (D) Two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.

- (2) One (1) sealer line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) infra red pre-heater exhausting through stack SLE1;
 - (B) One (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (C) One (1) sealer flash oven, exhausting through Stack SLE3; and
 - (D) One (1) electric oven to aid in the drying process, exhausting through Stack SLE4.

- (3) One (1) topcoat line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
 - (B) One (1) infra red pre-heater exhausting through stack TL1;
 - (C) One (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (D) One (1) topcoat flash oven, exhausting through Stack TL3; and
 - (E) One (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the new affected source.

- (c) Woodworking operations, constructed in 2000, and modified in 2015, consisting of various woodworking equipment, with a combined maximum throughput of 716.67 pounds per hour, and with particulate matter emissions controlled by the following:
 - (i) One (1) baghouse, identified as BH1, exhausting indoors;
 - (ii) One (1) baghouse, identified as BH2, exhausting indoors;
 - (iii) One (1) baghouse, identified as BH3, exhausting indoors; and
 - (iv) One (1) baghouse, identified as BH4, exhausting indoors.

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):

- (a) One (1) cold cleaner degreaser parts washing tank, constructed in 1999 and permitted in 2016, identified as PW1, using a maximum of no more than 145 gallons of degreasing solvent per year, uncontrolled, and exhausting to the atmosphere. [326 IAC 8-3]

- (b) One (1) spent acetone solvent recycling collection unit, constructed in 1999 and permitted in 2016, identified as SR1, with a maximum rated capacity of 58,035 gallons per year, uncontrolled, and exhausting to the atmosphere. The waste from the unit is shipped offsite for waste processing with the clean solvent returning to the process. [326 IAC 2-2]

A.4 Other 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 other insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr;
 - (1) One (1) natural gas-fired air make-up unit, constructed in 2000, having a heat input rate of 3.0 MMBtu/hr;
 - (2) One (1) natural gas-fired air make-up unit, constructed in 2015, having a heat input rate of 4.136 MMBtu/hr;
 - (3) Two (2) natural gas-fired process heaters, constructed in 2006, each with a heat input rate of 1.25 MMBtu/hr;
 - (4) One (1) natural gas-fired process heater, constructed in 2013, having a heat input rate of 0.25 MMBtu/hr;
 - (5) Three (3) natural gas-fired radiant tube heaters, constructed in 2006, identified as ISA-1 through ISA-3, each having a heat input rate of 0.125 MMBtu/hr;
 - (6) Two (2) natural gas-fired radiant tube heaters, constructed in 2006, identified as ISA-4 and ISA-5, each having a heat input rate of 0.150 MMBtu/hr;
 - (7) One (1) natural gas-fired radiant tube heater, constructed in 2006, having a heat input rate of 0.125 MMBtu/hr;
 - (8) Three (3) natural gas-fired radiant tube heaters, constructed in 2006, each having a heat input rate of 0.150 MMBtu/hr;
 - (9) One (1) natural gas-fired space heater, constructed in 2000, having a heat input rate of 0.30 MMBtu/hr;
 - (10) One (1) natural gas-fired space heater, constructed in 2000, having a heat input rate of 0.20 MMBtu/hr; and
 - (11) One (1) natural gas-fired space heater, constructed in 2000, having a heat input rate of 0.13 MMBtu/hr.
- (b) One (1) aqueous adhesive application operation, identified as AA, constructed in 1999 and permitted in 2016, using flow coating for application, with a maximum capacity to coat 400 wood panels/cabinets per hour, uncontrolled, and exhausting to the atmosphere.
- (c) Two (2) panel brush cleaners, constructed in 2006 and permitted in 2016, identified as PC1 and PC2, with a maximum capacity of 400 parts per hour each, using dry fabric filters as control, and exhausting to the atmosphere.

A.5 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, T039-36432-00518, 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 April 15 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 or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 T039-36432-00518 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 combined permit, all previous registrations and permits are superseded by this combined new source review and 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 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.7 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.8 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.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (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.10 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.11 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.12 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.13 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation 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.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

- (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.

- (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.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(15)]: Spray Booth 2 and Automated Cabinet Finishing Line

- (a) One (1) surface coating spray booth, identified as Spray Booth 2, constructed in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes. Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered part of the new affected source.

- (b) One (1) automated cabinet finishing line, constructed in 2006, including the following equipment:
- (1) One (1) stain line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) infra red pre-heater exhausting through stack SL1;
 - (B) One (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
 - (C) One (1) stain wipe machine, exhausting through Stack SL3; and
 - (D) Two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.
 - (2) One (1) sealer line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) infra red pre-heater exhausting through stack SLE1;
 - (B) One (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (C) One (1) sealer flash oven, exhausting through Stack SLE3; and
 - (D) One (1) electric oven to aid in the drying process, exhausting through Stack SLE4.
 - (3) One (1) topcoat line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
 - (B) One (1) infra red pre-heater exhausting through stack TL1;
 - (C) One (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (D) One (1) topcoat flash oven, exhausting through Stack TL3; and
 - (E) One (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the new affected source.

The following specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21):

- (b) One (1) spent acetone solvent recycling collection unit, constructed in 1999 and permitted in 2016, identified as SR1, with a maximum rated capacity of 58,035 gallons per year, uncontrolled, and exhausting to the atmosphere. The waste from the unit is shipped offsite for waste processing with the clean solvent returning to the process. [326 IAC 2-2]

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

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the automated cabinet finishing line and Spray Booth 2, the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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

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

D.1.2 Prevention of Significant Deterioration (PSD) Minor Limit for Volatile Organic Compound (VOC) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents to the automated cabinet finishing line, Spray Booth 2, and the solvent recycling collection unit shall not exceed two hundred forty-seven (247) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other units at this source, shall limit the source-wide VOC emissions to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the automated cabinet finishing line and Spray Booth 2 shall each be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

(a) Compliance with the VOC limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Certified Product Data Sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste collected by the spent acetone solvent recycling collection unit or other waste material that is shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) An initial representative sample of the VOC containing waste to be shipped offsite shall be collected just prior to being shipped offsite, and the sample shall be analyzed for VOC content within 30 days of collection.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest

VOC content that could be present in the waste, as determined using the as supplied” and “as applied” VOC data sheets, for each month.

- (c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
- (d) Compliance with the VOC input limitations contained in Condition D.1.2(a) and (b) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.
- (e) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC input} = \text{SCL} - \text{SR}$$

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

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

D.1.6 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with the automated cabinet finishing line and Spray Booth 2. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the automated cabinet finishing line stacks (SL2, SLE2, and TL2) and Spray Booth 2 stacks (S1, S2, and S3) while one or more of the facilities are in operation. If abnormal emissions are 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.
- (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 particulate matter emissions, or when evidence of particulate matter emission 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.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limitation established in Condition D.1.2, and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage. Records necessary to

demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC input for each month and each compliance period; and
 - (5) If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.1.5, then the following records shall be maintained:
 - (A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
 - (B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
 - (C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(15)]: Woodworking Operations

- (c) Woodworking operations, constructed in 2000, and modified in 2015, consisting of various woodworking equipment, with a combined maximum throughput of 716.67 pounds per hour, and with particulate matter emissions controlled by the following:
- (i) One (1) baghouse, identified as BH1, exhausting indoors;
 - (ii) One (1) baghouse, identified as BH2, exhausting indoors;
 - (iii) One (1) baghouse, identified as BH3, exhausting indoors; and
 - (iv) One (1) baghouse, identified as BH4, exhausting indoors.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations shall not exceed 2.06 pounds per hour when operating at a combined process weight rate of 0.358 tons per hour.

The pounds per hour limitation was calculated using 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 Preventative Maintenance Plan is required for these woodworking operations and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.3 Particulate Control

- (a) In order to comply with condition D.2.1, the baghouses (BH1 through BH4) for particulate control shall be in operation and control emissions at all times the woodworking operations 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 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.4 Baghouse Inspections

Semiannual inspections shall be performed on the bags in baghouses (BH1, BH2, BH3, and BH4) controlling particulate emissions from the woodworking operations. All defective bags shall be replaced.

D.2.5 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 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).

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 or dust traces.

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

D.2.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of the results of the inspections required under Condition D.2.4.

- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) cold cleaner degreaser parts washing tank, constructed in 1999 and permitted in 2016, identified as PW1, using a maximum of no more than 145 gallons of degreasing solvent per year, uncontrolled, and exhausting to the atmosphere. [326 IAC 8-3]

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

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

D.3.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for the cold cleaner degreaser parts washing tank (PW1), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.3.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

NESHAP

Emissions Unit Description: Spray Booth 2 and Automated Cabinet Finishing Line

- (a) One (1) surface coating spray booth, identified as Spray Booth 2, approved for construction in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes. Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered part of the new affected source.

- (b) One (1) automated cabinet finishing line, constructed in 2006, including the following equipment:
- (1) One (1) stain line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) infrared pre-heater exhausting through stack SL1;
 - (B) One (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
 - (C) One (1) stain wipe machine, exhausting through Stack SL3; and
 - (D) Two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.
 - (2) One (1) sealer line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) infrared pre-heater exhausting through stack SLE1;
 - (B) One (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (C) One (1) sealer flash oven, exhausting through Stack SLE3; and
 - (D) One (1) electric oven to aid in the drying process, exhausting through Stack SLE4.
 - (3) One (1) topcoat line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
 - (B) One (1) infra red pre-heater exhausting through stack TL1;
 - (C) One (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (D) One (1) topcoat flash oven, exhausting through Stack TL3; and
 - (E) One (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the new affected source.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]**

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 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, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-14, for the emission unit(s) listed above:

- (1) 40 CFR 63.800(a) through (f)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a) and (b)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804(a)(1), (2), and (4), (b), (c)(1), (d)(2), (d)(1), (2), and (4), (e)(1), (f)(1), (2), (3), (5), (7), and (8), and (g)(1), (2), (3), (5), (7), and (8)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806(a), (b), (c), (d), (e), (h), (i), and (j)
- (8) 40 CFR 63.807(a), (b), (c) and (e)
- (9) 40 CFR 63.808

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Kountry Wood Products, LLC
Source Address: 500 E. Wabash Avenue, Nappanee, Indiana 46550
Part 70 Permit No.: T039-36432-00518

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: Kountry Wood Products, LLC
Source Address: 500 E. Wabash Avenue, Nappanee, Indiana 46550
Part 70 Permit No.: T039-36432-00518

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) daytime 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
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 Quarterly Report

Source Name: Kountry Wood Products, LLC
Source Address: 500 E. Wabash Avenue, Nappanee, Indiana 46550
Part 70 Permit No.: T039-36432-00518
Facility: The Automated Cabinet Finishing Line, Spray Booth 2, and the Solvent Recycling Collection Unit
Parameter: Volatile Organic Compound (VOC) input
Limit: The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents to the automated cabinet finishing line, Spray Booth 2, and the solvent recycling collection unit shall not exceed two hundred forty-seven (247) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	VOC Input 12 Month Total (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Kountry Wood Products, LLC
 Source Address: 500 E. Wabash Avenue, Nappanee, Indiana 46550
 Part 70 Permit No.: T039-36432-00518

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

<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. 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

Part 70 Operating Permit No: T039-36432-00518

[Downloaded from the eCFR on September 10, 2013]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

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:

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

(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×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×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.

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

§ 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	
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	

Reference	Applies to subpart JJ	Comment
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.	
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.

Reference	Applies to subpart JJ	Comment
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
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

Chemical name	CAS No.
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
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
Glycoethers ^a	
Hexachlorobenzene	118741
Hexachloro-1,3-butadiene	87683

Chemical name	CAS No.
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
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

Chemical name	CAS No.
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-Toluediamine	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 RR-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:		

Emission point	Existing source	New source
(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
(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
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 (hexachlorocyclohexane, gamma)	58899
2,4-Toluene diamine	95807
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444
1,2-Diphenylhydrazine	122667

Chemical name	CAS No.
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
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

Chemical name	CAS No.
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	0.0000006
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

CAS No.	Chemical name	EPA de minimis, tons/yr*
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
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

CAS No.	Chemical name	EPA de minimis, tons/yr*
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
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

CAS No.	Chemical name	EPA de minimis, tons/yr*
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
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

CAS No.	Chemical name	EPA de minimis, tons/yr*
	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**

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Kountry Wood Products, LLC
Source Location:	500 E. Wabash Avenue, Nappanee, IN 46550
County:	Elkhart
SIC Code:	2434 (Wood Kitchen Cabinets), 2499 (Wood Products, Not Elsewhere Classified)
Permit Renewal No.:	T039-36432-00518
Permit Reviewer:	Allen Reimer

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Kountry Wood Products, LLC relating to the operation of a stationary wood processing and finishing plant (kitchen cabinet manufacturing). On October 30, 2015, Kountry Wood Products, LLC submitted an application to the OAQ requesting to renew its operating permit. Kountry Wood Products, LLC was issued its second Part 70 Operating Permit Renewal T039-30318-00518 on August 26, 2011.

Source Definition

Kountry Wood Products, LLC owns a kitchen cabinet manufacturing plant at 500 E. Wabash Ave. in Nappanee. Kountry Wood Products, LLC has opened a second plant at 352 Shawnee St. in Nappanee, approximately two miles away. IDEM, OAQ has examined whether these two plants are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for two plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

Both plants will be owned and operated directly by Kountry Wood Products, LLC. IDEM's Nonrule Policy Document Air-005 states that if two or more plants have common corporate officers or if one entity has ownership of fifty-one percent (51%) or more of two or more plants, then common ownership exists. Since Kountry Wood Products, LLC owns 100% of both plants, common ownership exists. Air-005 also states that if the activities are owned by the same person or entity, common control exists. Therefore the first part of the major source definition is met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The plants will both produce kitchen cabinets under the two-digit SIC Code 24 for the Major Group Lumber and Wood Products, except Furniture. This group includes the four-digit SIC Code 2434, for wood kitchen cabinets.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. Under Kountry Wood Products, LLC's business plan, it is the company's intent that both plants are designed to be run as separate businesses with no output going from either plant to the other. However, one style of cabinet door is built at the Wabash Avenue plant and sent to the Shawnee Street plant for installation in cabinets built at the Shawnee Street plant. The Shawnee Street plant will build the majority of the doors used in the cabinets it produces. All of the doors and other parts used at the Wabash Avenue plant will be built on site. Under this scenario, the Shawnee Street plant will receive less than 7% of its doors (less than 1% of its total output) from the Wabash Avenue plant. The Shawnee Street plant will send none of its output to the Wabash Avenue plant. Therefore, neither plant will be a support facility to

the other plant. However, since the plants have the same two-digit SIC Code, the second part of the major source definition is met.

The last part of the definition is whether the plants are on contiguous or adjacent properties. The plants are located on separate properties that are approximately two miles apart. Since the plants are not on contiguous properties, IDEM examined whether the two plants are on adjacent properties.

The term "adjacent" is not defined in Indiana's air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region VIII to the Utah Division of Air Quality regarding the term "adjacent". This letter is in no way binding on IDEM, OAQ, but it is persuasive. Region VIII stated that any evaluation of what is "adjacent" must relate the guiding principal of a common sense notion of "source". The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

1. Are materials routinely transferred between the plants?
2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
3. Is the production process itself split in any way between the plants?

An intermediate product, one style of cabinet door, will be sent from the Wabash Avenue plant to the Shawnee Street plant. The two plants will have separate managers and separate staff with no shared staff. The Shawnee Street plant produces all of its own cabinets so that no part of the production process will be split between the plants. The plants are therefore not adjacent and do not meet the third part of the major source definition.

Since the Kountry Wood Products plants do not meet all three parts of the definition, IDEM, OAQ has determined that they are not part of the same major source. IDEM, OAQ will review this determination if the Wabash Avenue plant sends any output to the new Shawnee Street plant on a regular (i.e. not temporary) basis or if other material facts change regarding the operation of the two plants.

This conclusion was initially determined under Part 70 Operating Permit T039-30933-00714 on December 8, 2011. Minor updates to this determination were made as part of this renewal to provide clarification.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) surface coating spray booth, identified as Spray Booth 2, constructed in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2 will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes. Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), Spray Booth 2 is considered part of the new affected source.

- (b) One (1) automated cabinet finishing line, constructed in 2006, including the following equipment:
 - (1) One (1) stain line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (A) One (1) infra red pre-heater exhausting through stack SL1;

- (B) One (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
 - (C) One (1) stain wipe machine, exhausting through Stack SL3; and
 - (D) Two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.
- (2) One (1) sealer line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
- (A) One (1) infra red pre-heater exhausting through stack SLE1;
 - (B) One (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (C) One (1) sealer flash oven, exhausting through Stack SLE3; and
 - (D) One (1) electric oven to aid in the drying process, exhausting through Stack SLE4.
- (3) One (1) topcoat line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
- (A) One (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
 - (B) One (1) infra red pre-heater exhausting through stack TL1;
 - (C) One (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (D) One (1) topcoat flash oven, exhausting through Stack TL3; and
 - (E) One (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the new affected source.

- (c) Woodworking operations, constructed in 2000, and modified in 2015, consisting of various woodworking equipment, with a combined maximum throughput of 716.67 pounds per hour, and with particulate matter emissions controlled by the following:
- (i) One (1) baghouse, identified as BH1, exhausting indoors;
 - (ii) One (1) baghouse, identified as BH2, exhausting indoors;
 - (iii) One (1) baghouse, identified as BH3, exhausting indoors; and
 - (iv) One (1) baghouse, identified as BH4, exhausting indoors.

Insignificant Activities

The source also consists of the following existing permitted insignificant activities (as numbered in the permit):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr;
 - (1) One (1) natural gas-fired air make-up unit, constructed in 2000, having a heat input rate of 3.0 MMBtu/hr;
 - (5) Three (3) natural gas-fired radiant tube heaters, constructed in 2006, identified as ISA-1 through ISA-3, each having a heat input rate of 0.125 MMBtu/hr; and
 - (6) Two (2) natural gas-fired radiant tube heaters, constructed in 2006, identified as ISA-4 and ISA-5, each having a heat input rate of 0.150 MMBtu/hr.

Additional Insignificant Activities

The source also consists of the following existing insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21), that were not previously included in the permit:

- (a) One (1) cold cleaner degreaser parts washing tank, constructed in 1999 and permitted in 2016, identified as PW1, using a maximum of no more than 145 gallons of degreasing solvent per year, uncontrolled, and exhausting to the atmosphere. [326 IAC 8-3]
- (b) One (1) spent acetone solvent recycling collection unit, constructed in 1999 and permitted in 2016, identified as SR1, with a maximum rated capacity of 58,035 gallons per year, uncontrolled, and exhausting to the atmosphere. The waste from the unit is shipped offsite for waste processing with the clean solvent returning to the process. [326 IAC 2-2]

The source also consists of the following existing other insignificant activities, which are not specifically regulated, as defined in 326 IAC 2-7-1(21), that were not previously included in the permit (as numbered in the permit):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr;
 - (2) One (1) natural gas-fired air make-up unit, constructed in 2015, having a heat input rate of 4.136 MMBtu/hr.
 - (3) Two (2) natural gas-fired process heaters, constructed in 2006, each with a heat input rate of 1.25 MMBtu/hr.
 - (4) One (1) natural gas-fired process heater, constructed in 2013, having a heat input rate of 0.25 MMBtu/hr
 - (7) One (1) natural gas-fired radiant tube heater, constructed in 2006, having a heat input rate of 0.125 MMBtu/hr.
 - (8) Three (3) natural gas-fired radiant tube heaters, constructed in 2006, each having a heat input rate of 0.150 MMBtu/hr.
 - (9) One (1) natural gas-fired space heater, constructed in 2000, having a heat input rate of 0.30 MMBtu/hr.

- (10) One (1) natural gas-fired space heater, constructed in 2000, having a heat input rate of 0.20 MMBtu/hr.
- (11) One (1) natural gas-fired space heater, constructed in 2000, having a heat input rate of 0.13 MMBtu/hr.
- (b) One (1) aqueous adhesive application operation, identified as AA, constructed in 1999 and permitted in 2016, using flow coating for application, with a maximum capacity to coat 400 wood panels/cabinets per hour, uncontrolled, and exhausting to the atmosphere.
- (c) Two (2) panel brush cleaners, constructed in 2006 and permitted in 2016, identified as PC1 and PC2, with a maximum capacity of 400 parts per hour each, using dry fabric filters as control, and exhausting to the atmosphere.

Insignificant Activities Removed from the Permit

The source has removed the following insignificant activities from the Permit:

- (a) One (1) natural gas-fired air make-up unit, constructed in 2000, having a heat input rate of 1.0 MMBtu/hr.
- (b) Nine (9) natural gas-fired process heaters, constructed in 2000, each with heat input rate of 0.108 MMBtu/hr.
- (c) One (1) natural gas-fired process heater, constructed in 2000, having a heat input rate of 0.24 MMBtu/hr

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal T039-30318-00518 on August 26, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 039-36159-00518 issued on September 10, 2015; and
- (b) Significant Permit Modification No. 039-36311-00518 issued on January 21, 2016.

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.

Air Pollution Control Justification as an Integral Part of the Process

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for determining operating permit level purposes and for determining the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and Prevention of Significant Deterioration (PSD).

Enforcement Issue

There are no pending enforcement actions.

As part of this renewal, existing insignificant activities that were not previously included in the permit have been added to the permit. These insignificant activities are listed in this Technical Support Document under the condition entitled "Additional Insignificant Activities". These insignificant activities did not need construction approval and the total potential to emit from all these units combined was below the Minor Permit Revision thresholds. Therefore there are no enforcement actions pending for these units.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- (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. Elkhart 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}**
 Elkhart County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Elkhart County has been classified as attainment or unclassifiable in Indiana for all other 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

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC, PM10, and PM2.5 are equal to or greater than 100 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.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) 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.

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.

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	Total HAPs	Worst Single HAP
Spray Booth 2***	0.29	0.29	0.29	-	-	247	-	16.24	8.29 (Toluene)
Automated Cabinet Finishing Line***	4.54	4.54	4.54	-	-		-	257.38	130.6 (Toluene)
Solvent Recycling Unit****	-	-	-	-	-		-	-	-
Woodworking Operation*****	8.00	8.00	8.00	-	-	-	-	-	-
Natural Gas-Fired Combustion	0.10	0.39	0.39	0.03	5.15	0.28	4.33	0.09	0.08 (Hexane)
Degreaser	-	-	-	-	-	0.49	-	-	-
Panel Brush Cleaners	0.72	0.72	0.72	-	-	-	-	-	-
Adhesive Application	0.00	0.00	0.00	-	-	1.19	-	-	-
Total PTE of Entire Source	13.65	13.94	13.94	0.03	5.15	248.96	4.33	273.71	138.91 (Toluene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".

**PM_{2.5} listed is direct PM_{2.5}.

***Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

****All VOC and HAP emissions from the solvent recycling unit are assumed to be emitted in the PTE of Spray Booth 2 and the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).

*****PTE after issuance for the woodworking operation is after integral woodworking controls.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(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).
- (c) The emissions in the table above are based upon TSD Appendix A.

PSD Minor Limits

- (a) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents to the automated cabinet finishing line, Spray Booth 2, and the solvent recycling collection unit shall not exceed two hundred forty-seven (247) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other units at this source, shall limit the source-wide VOC emissions to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

Federal Rule Applicability

Compliance Assurance Monitoring (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:

CAM Applicability Analysis							
Emission Unit (pollutant)	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Woodworking BH1 (PM10/PM2.5)	Baghouse	Y	145.39*	2.34	100	N	N
Woodworking BH2 (PM10/PM2.5)	Baghouse	Y	100.35*	1.62	100	N	N
Woodworking BH3 (PM10/PM2.5)	Baghouse	Y	125.67*	2.02	100	N	N
Woodworking BH4 (PM10/PM2.5)	Baghouse	Y	125.68*	2.02	100	N	N
Stain Line Brush Cleaner PC1 (PM10/PM2.5)	Dry Filter	N	0.574	0.172	100	N	N
Sealer Line Brush Cleaner PC2 (PM10/PM2.5)	Dry Filter	N	0.144	0.043	100	N	N

* Potential to emit after consideration of inherent process equipment (woodworking controls)

Pursuant to 40 CFR Part 64.1, the definition of inherent process equipment is "equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered subject to CAM."

The woodworking baghouse controls are determined to be necessary for the normal and proper operation of the woodworking operations (*see the "Integral Part of the Process" Determination" section above for more detail*). Therefore, the woodworking baghouses meet the criteria for inherent to the process for the purpose of determining CAM applicability, and are not considered control devices. Therefore, the requirements of 40 CFR Part 64.2, CAM do not apply to the woodworking operations.

The automated cabinet finishing line and Spray Booth 2 at this source are subject to 40 CFR 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, which was promulgated after November 15, 1990. Therefore, pursuant to 40 CFR 64.2(b)(1)(i), the requirements of 40 CFR Part 64, CAM are not applicable to the automated cabinet finishing line and Spray Booth 2.

The natural gas-fired combustion sources, cold cleaner degreaser parts washing tank (PW1), spent acetone solvent recycling collection unit (SR1), and aqueous adhesive application operation (AA) each do not the potential to emit before controls equal to or greater than the major source thresholds for any pollutant, are not subject to an emission limitation or standard, and do not use a control device. Therefore, pursuant to 40 CFR 64.2(a), the requirements of 40 CFR 64, CAM are not applicable to the natural gas-fired combustion sources, cold cleaner degreaser parts washing tank (PW1), spent acetone solvent recycling collection unit (SR1), and aqueous adhesive application operation (AA).

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the natural gas-fired units at this source, because they have maximum heat input

- capacities of less than ten (10) million British thermal units per hour (MMBtu/hr), each, and are not steam generating units as defined in §60.41c.
- (b) The requirements of the New Source Performance Standards of Performance for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not perform surface coating of metal furniture as defined in §60.310(a).
 - (c) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles or light duty trucks as defined in §60.390(a).
 - (d) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the permit, since this source does not coat sensitive tape or label materials as defined in §60.440(a).
 - (e) The requirements of the New Source Performance Standards for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since this source does not apply surface coatings to large appliances as defined in §60.451.
 - (f) The requirements of the New Source Performance Standards for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included in the permit, since this source does not apply surface coating to metal coils as defined in §60.461.
 - (g) The requirements of the New Source Performance Standards for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included in the permit, since this source does not apply surface coating to beverage cans as defined in §60.491.
 - (h) The requirements of the New Source Performance Standard for Magnetic Tape Coating Facilities, 40 CFR 60, Subpart SSS (326 IAC 12), are not included in the permit, since this source does not coat magnetic tape as defined in §60.711(a)(13).
 - (i) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12), are not included in the permit, since this source does not coat plastic parts for business machines as defined in §60.721(a).
 - (j) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (b) This source is still subject to the National Emissions Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14, since this source is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components as defined in §63.801, and this source is located at a major source of HAPs as defined in §63.2.

The facilities subject to this rule include the following:

- (1) One (1) surface coating spray booth, identified as Spray Booth 2, constructed in 1998, utilizing an air assisted airless and HVLP spray application system, coating a maximum of 50 wood cabinet door fronts per hour, using dry filters for particulate matter overspray control, and exhausting to three (3) stacks, identified as S1, S2, and S3. Spray Booth 2

will be used as a backup as needed when any one of the surface coating lines of the automated cabinet finishing line is down for maintenance or other purposes. Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

- (2) One (1) automated cabinet finishing line, constructed in 2006, including the following equipment:
 - (A) One (1) stain line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (i) One (1) infra red pre-heater exhausting through stack SL1;
 - (ii) One (1) automated stain finishing booth, utilizing computer controlled air-assisted airless spray application of stain to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SL2;
 - (iii) One (1) stain wipe machine, exhausting through Stack SL3; and
 - (iv) Two (2) zoned stain flash tunnels, exhausting through Stacks SL4 and SL5.
 - (B) One (1) sealer line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (i) One (1) infra red pre-heater exhausting through stack SLE1;
 - (ii) One (1) automated sealer finishing booth, utilizing computer controlled air-assisted airless spray application of sealer to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack SLE2;
 - (iii) One (1) sealer flash oven, exhausting through Stack SLE3; and
 - (iv) One (1) electric oven to aid in the drying process, exhausting through Stack SLE4.
 - (C) One (1) topcoat line, constructed in 2006, with a maximum capacity of 400 cabinets per hour, consisting of the following:
 - (i) One (1) scuffer/denibber, with insignificant particulate emissions, controlled by one (1) dust collection system, exhausting to the indoors;
 - (ii) One (1) infra red pre-heater exhausting through stack TL1;
 - (iii) One (1) automated topcoat finishing booth, utilizing computer controlled air-assisted airless spray application of topcoat to wood cabinet fronts on an automated carousel, controlled by dry filters, and exhausting through Stack TL2;
 - (iv) One (1) topcoat flash oven, exhausting through Stack TL3; and
 - (v) One (1) electric oven to aid in the drying process, exhausting through Stack TL4.

Under NESHAP JJ, Spray Booth 2 and the automated cabinet finishing line are considered existing affected sources.

Nonapplicable portions of the NESHAP will not be included in the permit. The entire rule is included as Attachment A of the permit. These units are subject to the following portions of Subpart JJ:

- (1) 40 CFR 63.800(a) through (f)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a) and (b)
- (4) 40 CFR 63.803

- (5) 40 CFR 63.804(a)(1), (2), and (4), (b), (c)(1), (d)(2), (d)(1), (2), and (4), (e)(1), (f)(1), (2), (3), (5), (7), and (8), and (g)(1), (2), (3), (5), (7), and (8)
- (6) 40 CFR 63.805(a)
- (7) 40 CFR 63.806(a), (b), (c), (d), (e), (h), (i), and (j)
- (8) 40 CFR 63.807(a), (b), (c) and (e)
- (9) 40 CFR 63.808

The provisions of 40 CFR 63, Subpart A -- General Provisions, which are incorporated as 326 IAC 20-1, apply to the above listed facilities when otherwise specified in 40 CFR 63, Subpart JJ.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD (326 IAC 20), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not manufacture plywood and composite wood products as defined in §63.2292.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK (326 IAC 20-86), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat metal cans as defined in §63.3561.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat miscellaneous metal parts and products as defined in §63.3881.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN (326 IAC 20-63), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat large appliances as defined in §63.4181.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat plastic parts and products as defined in §63.4481.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat wood building products as defined in §63.4781.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat metal furniture as defined in §63.4981.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS (326 IAC 20-64), are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat metal coil as defined in §63.5110.

- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in the permit for the natural gas-fired units, since, although this source is a major source of HAPs as defined in §63.2, these units are not industrial, commercial, or institutional boilers or process heaters as defined in §63.7575.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20), are not included in the permit, since this source is not an area source of HAPs, this source does not have paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) in paint removal processes, the source does not have autobody refinishing operations, and the source does not spray apply coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources, 40 CFR 63, Subpart QQQQQQ (326 IAC 20), are not included in the permit, since this source is not an area source of HAPs, and it does not perform wood preserving as defined in §63.11433.
- (o) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

PSD applicability is discussed under the Potential to Emit After Issuance section above.

326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, 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 and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3(b)(1) by July 1, 2016, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (PM Limitations Except Lake County)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Coating Operations

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

- (1) The operation of Spray Booth 2 will emit less than ten (10) tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. In addition, this unit is specifically regulated by NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d) of the CAA, this unit is exempt from the requirements of 326 IAC 2-4.1. Therefore, 326 IAC 2-4.1 does not apply.
- (2) The operation of the automated cabinet finishing line 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 this unit is specifically regulated by NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d) of the CAA, this unit is exempt from the requirements of 326 IAC 2-4.1.

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

The automated cabinet finishing line and Spray Booth 2 are each subject to 326 IAC 6-3-2 since each does not use less than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-2(d), the automated cabinet finishing line and Spray Booth 2 shall each be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 8-1-6(3)(A), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the automated cabinet finishing line or Spray Booth 2, because each is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

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

This rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The automated cabinet finishing line and Spray Booth 2 are subject to the requirements of 326 IAC 8-2-12, since they will apply coatings to wood furniture (or wood furniture components) and have potential VOC emissions of greater than fifteen (15) pounds of VOC per day, each.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the automated cabinet finishing line and Spray Booth 2, the Permittee shall perform surface coating of wood furniture and

cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source utilizes High Volume Low Pressure (HVLP) spray applications or Air Assisted Airless Spray application methods for all surface coating operations; therefore, the source is able to comply with 326 IAC 8-2-12.

326 IAC 8-11 (Wood Furniture Coatings)

Pursuant to 326 IAC 8-11(1), the automated cabinet finishing line and Spray Booth 2 are not subject to the requirements of 326 IAC 8-11 since the source is not located in Lake, Porter, Clark, or Floyd Counties.

Woodworking

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

Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable the woodworking operation, since it has potential particulate emissions after integral woodworking controls of greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the woodworking operations shall not exceed 2.06 pounds per hour based on a combined process weight rate equal to 0.358 tons of wood per hour. The allowable rate of emission was calculated as follows:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

In order to comply with the allowable rate of emission, the baghouses for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

Natural Gas Combustion

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

The five (5) radiant tube heaters (ISA-1 through ISA-5), two (2) air makeup units, and ten (10) process heaters are each not subject to 326 IAC 6-2 since each unit is not a source of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired units including the five (5) radiant tube heaters (ISA-1 through ISA-5), two (2) air makeup units, and ten (10) process heaters are not

subject to the requirements of 326 IAC 6-3 since they each have the potential to emit particulate matter less than 0.551 pounds per hour.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The five (5) radiant tube heaters (ISA-1 through ISA-5), two (2) air makeup units, and ten (10) process heaters are each not subject to 326 IAC 7-1.1 because each unit's SO₂ PTE is less than twenty-five (25) tons per year or ten (10) pounds per hour.

Cold Cleaner Degreaser

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the cold cleaner degreaser parts washing tank (PW1), since the unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2(a)(1), the cold cleaner degreaser parts washing tank (PW1) is subject to the requirements of 326 IAC 8-3-2, since it was constructed after July 1, 1990, and performs organic solvent degreasing.

Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Operation), for the cold cleaner degreaser parts washing tank (PW1), the Permittee shall:

- (1) Equip the degreaser with a cover;
- (2) Equip the degreaser with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label that lists the operation requirements in subdivisions (3), (4), (6), and (7);
- (6) Store waste solvent only in closed containers; and
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-2(b), for the cold cleaner degreaser parts washing tank (PW1), the Permittee shall ensure the following additional equipment and operating requirements are met:

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-5 (Cold Cleaner Degreaser)

On January 30, 2013, the Indiana Environmental Control Board repealed 326 IAC 8-3-5 (Cold Cleaner Degreaser). Therefore, the source is not subject to this rule.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2016, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Solvent Recycling

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the acetone solvent recycling unit (SR1), since the unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-4-3 (VOC Rules: Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-3(a), the requirements of 326 IAC 8-4-3 are not applicable to the acetone solvent recycling unit (SR1), since acetone is not considered a petroleum liquid and this unit does not include storage vessels within its process.

326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of 326 IAC 8-6 are not applicable to the acetone solvent recycling unit (SR1), since this source is not located in Lake or Marion Counties, and the source was constructed after January 1, 1980.

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

Pursuant to 326 IAC 8-7-2(a), the requirements of 326 IAC 8-7 are not applicable to the acetone solvent recycling unit (SR1), since this source is not located in Lake, Porter, Clark, or Floyd Counties.

326 IAC 8-9 (VOC Rules: Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1(a), the requirements of 326 IAC 8-9 are not applicable to the acetone solvent recycling unit (SR1), since this source is not located in Lake, Porter, Clark, or Floyd Counties.

Adhesive Application

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

Pursuant to 326 IAC 6-3-1(a)(7), the requirements of 326 IAC 6-3 are not applicable to the aqueous adhesive application operation (AA1), since it uses flow coating, which is specifically exempted from this rule.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Pursuant to 326 IAC 8-1-6(1), the requirements of 326 IAC 8-1-6 are not applicable to the aqueous adhesive application operation (AA1), since it does not have potential emissions of VOC of twenty-five (25) tons or more per year.

326 IAC 8-2-5 (VOC Rules: Paper Coating Operations)

Pursuant to 326 IAC 8-2-5(a), the requirements of 326 IAC 8-2-5 are not applicable to the aqueous adhesive application operation (AA1), since it does not perform surface coating of paper. This unit coats wood panels and cabinets.

326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)

Pursuant to 326 IAC 8-2-9(a), the requirements of 326 IAC 8-2-9 are not applicable to the aqueous adhesive application operation (AA1), since it does not perform surface coating of miscellaneous metal and plastic parts. This unit coats wood panels and cabinets.

326 IAC 8-2-10 (VOC Rules: Flat Wood Panels; Manufacturing Operations)

Pursuant to 326 IAC 8-2-10(a), the requirements of 326 IAC 8-2-10 are not applicable to the aqueous adhesive application operation (AA1), since this source does not manufacture flat wood panels and does not surface coat printed interior panels made of hardwood plywood and thin particle board, natural finish hardwood plywood panels, hardboard paneling with Class II finishes, exterior siding, or tileboard. This source manufactures solid wood cabinets and applies surface finishing to solid wood cabinets.

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

This rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-12 are not applicable to the aqueous adhesive application operation (AA1), since, although this unit was constructed after July 1, 1990 and it will apply coatings to wood furniture (or wood furniture components) and, it does not have potential VOC emissions of greater than fifteen (15) pounds of VOC per day.

326 IAC 8-11 (Wood Furniture Coatings)

Pursuant to 326 IAC 8-11(1), the requirements of 326 IAC 8-11 are not applicable to the aqueous adhesive application operation (AA1), since the source is not located in Lake, Porter, Clark, or Floyd Counties.

326 IAC 8-22 (VOC Rules: Miscellaneous Industrial Adhesives)

Pursuant to 326 IAC 8-22-1(a), the requirements of 326 IAC 8-22 are not applicable to the aqueous adhesive application operation (AA1), since this source is not located in Lake or Porter Counties.

Panel Brush Cleaners

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

Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 are not applicable to the panel brush cleaners (PC1 and PC2), since each unit does not have potential emissions of PM greater than five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination and Monitoring Requirements

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

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

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

- (a) The automated cabinet finishing line, spray booth 2, and woodworking operations each have applicable compliance monitoring conditions as specified below:

Emission Units	Control	Parameter	Frequency
Automated Cabinet Finishing Line	Dry Filters	filter inspection	Daily
		overspray observation	Weekly
		overspray on the rooftops and the nearby ground	Monthly
Spray Booth 2	Dry Filters	filter inspection	Daily
		overspray observation	Weekly
		overspray on the rooftops and the nearby ground	Monthly
Woodworking Operations	Baghouse BH1, BH2, BH3, and BH4	Baghouse Inspections	Semiannually

These monitoring conditions are necessary because the dry filters for the automated cabinet finishing line and Spray Booth 2 and the baghouses (BH1 through BH4) for the woodworking operations must operate properly to assure compliance with 326 IAC 6-3, and 326 IAC 2-7 (Part 70).

- (b) The automated cabinet finishing line and spray booth 2 have additional applicable compliance determination conditions as specified below:
 - (1) Compliance with the Prevention of Significant Deterioration Minor Limit for Volatile Organic Compounds shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Certified Product Data Sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
 - (2) If the amount of VOC in the waste collected by the spent acetone solvent recycling collection unit or other waste material that is shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:
 - (A) On-Site Sampling
 - (i) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
 - (ii) An initial representative sample of the VOC containing waste to be shipped offsite shall be collected just prior to being shipped

offsite, and the sample shall be analyzed for VOC content within 30 days of collection.

- (iii) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
- (iv) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC containing waste. Such change could include, but is not limited to, the following:
 - (AA) A change in the coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
 - (BB) An operational change in the coating application or cleanup operations.
- (B) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
- (C) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.
- (3) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
- (4) Compliance with the VOC input limitations that render the requirements of 326 IAC 2-2 (PSD) not applicable shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.
- (5) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC input} = \text{SCL} - \text{SR}$$

Where:

- SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and
- SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

Recommendation

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.

An application for the purposes of this review was received on October 30, 2015. Additional information was received on April 20, 2016, April 28, 2016, May 12, 2016, and May 25, 2016.

Conclusion

The operation of this stationary wood processing and finishing plant (kitchen cabinet manufacturing) shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T039-36432-00518.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Allen Reimer 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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: Emissions Calculations
Emission Summary**

**Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer**

Uncontrolled Potential Emissions (tons/year)										
Emissions Generating Activity										
Category	Pollutant	Surface Coating Spray Booth 2	Automated Cabinet Finishing Line (stain line, sealer line, topcoat line)	Solvent Recycling Unit*	Woodworking Operation	Natural Gas-Fired Combustion Units	Degreaser	Panel Brush Cleaners	Adhesive Application	TOTAL
Criteria Pollutants	PM	14.3	227.2	-	497.1	0.10	-	0.72	0.00	739.45
	PM10	14.3	227.2	-	497.1	0.39	-	0.72	0.00	739.75
	PM2.5	14.3	227.2	-	497.1	0.39	-	0.72	0.00	739.75
	SO2	-	-	-	-	0.03	-	-	-	0.03
	NOx	-	-	-	-	5.15	-	-	-	5.15
	VOC	49.6	968.8	0*	-	0.28	0.49	-	1.19	1020.37
	CO	-	-	-	-	4.33	-	-	-	4.33
Hazardous Air Pollutants	Xylenes	6.20	101.2	0*	-	-	-	-	-	107.4
	DGMBE	0.04	0.31	0*	-	-	-	-	-	0.34
	Ethylbenzene	1.45	22.8	0*	-	-	-	-	-	24.3
	EGME	0.22	1.79	-	-	-	-	-	-	2.01
	Chromium	1.1E-02	0.09	-	-	6.4E-05	-	-	-	0.10
	Manganese	-	-	-	-	1.7E-05	-	-	-	1.7E-05
	Nickel	-	-	-	-	9.6E-05	-	-	-	9.6E-05
	n-Hexane	-	-	-	-	0.08	-	-	-	0.08
	Toluene	8.29	130.6	0*	-	1.6E-04	-	-	-	138.9
	Benzene	-	-	-	-	9.6E-05	-	-	-	9.6E-05
	Dichlorobenzene	-	-	-	-	5.5E-05	-	-	-	5.5E-05
	Formaldehyde	0.03	0.53	0*	-	3.4E-03	-	-	-	0.57
	Lead	-	-	-	-	2.3E-05	-	-	-	2.3E-05
	Cadmium	-	-	-	-	5.0E-05	-	-	-	5.0E-05
Totals		16.24	257.38	0.00	-	0.09	-	-	-	273.71
Worse Case HAP										138.91

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

*Acetone is used as a cleanup solvent in the Surface Coating Spray Booth 2 and the Automated Cabinet Finishing Line, with the spent acetone recycled in the solvent recycling collection unit (SR1). Potential VOC and HAP emissions from the solvent recycling collection unit (SR1) are assumed to be emitted in the Spray Booth 2 and the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).

Potential to Emit After Issuance (tons/year)										
Emissions Generating Activity										
Category	Pollutant	Surface Coating Spray Booth 2**	Automated Cabinet Finishing Line (stain line, sealer line, topcoat line)**	Solvent Recycling Unit*	Woodworking Operation***	Natural Gas-Fired Combustion Units	Degreaser	Panel Brush Cleaners	Adhesive Application	TOTAL
Criteria Pollutants	PM	0.29	4.54	-	8.00	0.10	-	0.72	0.00	13.65
	PM10	0.29	4.54	-	8.00	0.39	-	0.72	0.00	13.94
	PM2.5	0.29	4.54	-	8.00	0.39	-	0.72	0.00	13.94
	SO2	-	-	-	-	0.03	-	-	-	0.03
	NOx	-	-	-	-	5.15	-	-	-	5.15
	VOC	-	247.0	-	-	0.28	0.49	-	1.19	248.96
	CO	-	-	-	-	4.33	-	-	-	4.33
Hazardous Air Pollutants	Xylenes	6.20	101.2	0*	-	-	-	-	-	107.4
	DGMBE	0.04	0.31	0*	-	-	-	-	-	0.34
	Ethylbenzene	1.45	22.8	0*	-	-	-	-	-	24.3
	EGME	0.22	1.79	-	-	-	-	-	-	2.01
	Chromium	1.1E-02	0.09	-	-	6.4E-05	-	-	-	0.10
	Manganese	-	-	-	-	1.7E-05	-	-	-	1.7E-05
	Nickel	-	-	-	-	9.6E-05	-	-	-	9.6E-05
	n-Hexane	-	-	-	-	0.08	-	-	-	0.08
	Toluene	8.29	130.6	0*	-	1.6E-04	-	-	-	138.9
	Benzene	-	-	-	-	9.6E-05	-	-	-	9.6E-05
	Dichlorobenzene	-	-	-	-	5.5E-05	-	-	-	5.5E-05
	Formaldehyde	0.03	0.53	0*	-	3.4E-03	-	-	-	0.57
	Lead	-	-	-	-	2.3E-05	-	-	-	2.3E-05
	Cadmium	-	-	-	-	5.0E-05	-	-	-	5.0E-05
Totals		16.24	257.38	0.00	-	0.09	-	-	-	273.71
Worse Case HAP										138.91

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

*Acetone is used as a cleanup solvent in the Surface Coating Spray Booth 2 and the Automated Cabinet Finishing Line, with the spent acetone recycled in the solvent recycling collection unit (SR1). Potential VOC and HAP emissions from the solvent recycling collection unit (SR1) are assumed to be emitted in the Spray Booth 2 and the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).

**Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

***PTE after issuance for the woodworking operation is after integral woodworking controls.

**Appendix A: Emissions Calculations
Surface Coating Spray Booth 2
Hazardous Air Pollutants (HAPs)**

**Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer**

Spray Booth 2 will only apply one surface coating at a time. Therefore, the potential to emit (PTE) is calculated assuming that the worst case coating is applied 8,760 hours per year. This booth can operate using two (2) separate scenarios: 1) The application of a stain or clear topcoat; or 2) The application of a white topcoat. Highest VOC/HAP coatings are used to determine the potential to emit.

Unrestricted Potential to Emit

Operation and Material	Maximum Usage (lb/hr)	Weight % Xylenes	Xylenes Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)	Weight % EB	EB Emissions (tons/yr)	Weight % Cr CMPD	Cr CMPD Emissions (tons/yr)	Weight % DGMBE	DGMBE Emissions (tons/yr)	Weight % HCOH	HCOH Emissions (tons/yr)	Weight % EGME	EGME Emissions (tons/yr)	Total HAPs (tons/yr)															
Stain Application																															
Driftwood Spray Stain (54070.601) - Highest HAP	4.86	2.11%	0.45	0.00%	0.00	0.00%	0.00	0.05%	0.01	0.18%	0.04	0.00%	0.00	1.05%	0.22	0.72															
Clear Sealer/Topcoat Application																															
Clear Sealer/Topcoat (DANSPEED 424-4554)	19.32	0.00%		5.23%		0.00%		0.00%		0.00%		0.03%		0.00%																	
Sealer/Topcoat Catalyst (873-0870)	1.86	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		0.00%																	
Clear Sealer/Topcoat (as applied)	21.18	0.00%	0.00	4.77%	4.43	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.03%	0.03	0.00%	0.00	4.45															
White Topcoat Application																															
White Topcoat (DANSPEED KW-L122-0002)	19.14	7.39%		9.89%		1.73%		0.00%		0.00%		0.04%		0.00%																	
Sealer/Topcoat Catalyst (873-0870)	1.53	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		0.00%																	
White Topcoat (as applied)	20.67	6.84%	6.20	9.16%	8.29	1.60%	1.45	0.00%	0.00	0.00%	0.00	0.04%	0.03	0.00%	0.00	15.97															
Worst Case Coating PTE =			6.20	Worst Case Coating PTE =			8.29	Worst Case Coating PTE =			1.45	Worst Case Coating PTE =			0.01	Worst Case Coating PTE =			0.04	Worst Case Coating PTE =			0.03	Worst Case Coating PTE =			0.22	Worst Case Coating PTE =			15.97
Worst Case Coating PTE (Total HAPs) =																	16.24														

METHODOLOGY

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

ACRONYMS

EB = ethylbenzene
Cr CMPD = Chromium (III) Compounds
DGMBE = Diethylene Glycol Monobutyl Ether
HCOH = formaldehyde

Appendix A: Emissions Calculations
Automated Cabinet Finishing Line
Stain Line, Sealer Line, and Topcoat Line
Volatile Organic Comounds (VOC) and Particulate Matter (PM)

Company Name: Kountry Wood Products LLC
 Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
 Part 70 Operating Permit Renewal No.: T039-36432-00518
 Reviewer: Allen Reimer

Unrestricted Potential to Emit

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)	lb VOC per gal solids	Transfer Efficiency
Stain Line																					
Fairfield Maple Stain (ST-1277) Highest VOC Stain	Wood	6.48	99.20%	0.00%	0.80%	99.20%	0.00%	0.40%	0.0150	400	144.0	38.88	6.43	6.43	38.6	925.7	168.93	0.1	0.5	1607.04	65%
Sealer Line - Scenario 1 - Clear Sealer Application																					
Clear Sealer (DANSPEED 424-4554)		7.76	60.70%	15.83%	39.30%	44.87%	18.58%	24.33%	0.0496	400	476.2	153.96									
Sealer Catalyst (873-0870)		7.44	81.18%	0.22%	18.82%	80.96%	0.20%	17.93%	0.005	400	48.0	14.88									
Clear Sealer (as applied)	Wood	7.73	62.50%	14.45%	37.50%	48.05%	16.90%	23.74%	0.0546	400	524.2	168.84	4.47	3.71	81.1	1947	355.34	22.2	97.0	15.64	65%
Sealer Line - Scenario 2 - White Sealer Application																					
White Sealer (DANSPEED KW-L122-0002)		9.27	52.75%	0.00%	47.25%	52.75%	0.00%	31.55%	0.0413	400	396.5	153.14									
Sealer Catalyst (873-0870)		7.44	81.18%	0.22%	18.82%	80.96%	0.20%	17.93%	0.0041	400	39.4	12.20									
White Sealer (as applied)	Wood	9.10	55.26%	0.02%	44.74%	55.24%	0.02%	30.30%	0.0454	400	435.8	165.30	5.03	5.03	91.3	2191.3	399.9	25.9	113.4	16.59	65%
Maximum Potential Emission Rate Scenario for Sealer Line																					
															91.3	2191.3	399.9	25.9	113.4	16.59	65%
Topcoat Line - Scenario 1 - Clear Topcoat Application																					
Clear Topcoat (DANSPEED 424-4554)		7.76	60.70%	15.83%	39.30%	44.87%	18.58%	24.33%	0.0496	400	476.2	153.96									
Topcoat Catalyst (873-0870)		7.44	81.18%	0.22%	18.82%	80.96%	0.20%	17.93%	0.005	400	48.0	14.88									
Clear Topcoat (as applied)	Wood	7.73	62.50%	14.45%	37.50%	48.05%	16.90%	23.74%	0.0546	400	524.2	168.84	4.47	3.71	81.1	1947	355.34	22.2	97.0	15.64	65%
Topcoat Line - Scenario 2 - White Topcoat Application																					
White Topcoat (DANSPEED KW-L122-0002)		9.27	52.75%	0.00%	47.25%	52.75%	0.00%	31.55%	0.0413	400	396.5	153.14									
Topcoat Catalyst (873-0870)		7.44	81.18%	0.22%	18.82%	80.96%	0.20%	17.93%	0.0041	400	39.4	12.20									
Topcoat (as applied)	Wood	9.10	55.26%	0.02%	44.74%	55.24%	0.02%	30.30%	0.0454	400	435.8	165.30	5.03	5.03	91.3	2191.3	399.9	25.9	113.4	16.59	65%
Maximum Potential Emission Rate Scenario for Topcoat Line																					
															91.3	2191.3	399.9	25.9	113.4	16.59	65%

Operating Scenarios:

Scenario 1: Stain Booth + Sealer Booth w/ Clear Sealer + Topcoat Booth w/ Clear Topcoat
 Scenario 2: Sealer Booth w/ White Sealer + Topcoat Booth w/ White Topcoat; No Stain Booth Operation

Total Uncontrolled Potential to Emit (PTE) =	221.18	5308.31	968.77	51.88	227.25
Actual Emissions based on 8 hours per day =	221.18	1769.44			

METHODOLOGY

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]
 Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hour/day]
 Pounds of VOC per Gallon Coating less Water and non-VOCs = [Density (lb/gal)] * [Weight % VOCs] / [1 - (Volume % water and non-VOCs)]
 Pounds of VOC per Gallon Coating = [Density (lb/gal)] * [Weight % VOCs]
 PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOCs]
 PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]
 PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]
 PTE of PM/PM10/PM2.5 (tons/yr) = [Density (lbs/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency] * [365 days/yr] * [1 ton/2000 lbs]
 Pounds VOC per Gallon of Solids = [Density (lbs/gal)] * [Weight % VOCs] / [Volume % solids]
 Controlled PTE = [Uncontrolled PTE] * [1 - Control Efficiency]
 Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/day)] * [Actual Hours of Operation (hours/day)]
 PM10 and PM2.5 emissions assumed equal to PM emissions.

Dry Filter Control Efficiency =					98.0%	
Stain Line PM/PM10/PM2.5 Emissions after controls/limits =					0.002	
Sealer Line PM/PM10/PM2.5 Emissions after controls/limits =					0.518	
Topcoat Line PM/PM10/PM2.5 Emissions after controls/limits =					0.518	
Total Controlled/Limited PTE of PM/PM10 (tons/yr) =					1.038	
					4.545	

**Appendix A: Emissions Calculations
Automated Cabinet Finishing Line
Stain Line, Sealer Line, and Topcoat Line
Hazardous Air Pollutants (HAPs)**

Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer

Unrestricted Potential to Emit

Operation and Material	Maximum Usage (lb/hr)	Weight % Xylenes	Xylenes Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)	Weight % EB	EB Emissions (tons/yr)	Weight % Cr CMPD	Cr CMPD Emissions (tons/yr)	Weight % DGMBE	DGMBE Emissions (tons/yr)	Weight % HCOH	HCOH Emissions (tons/yr)	Weight % EGME	EGME Emissions (tons/yr)	Total (tons/yr)
Stain Line																
Driftwood Spray Stain (54070.601) - Highest HAP Stain	38.88	2.11%	3.59	0.00%	0.00	0.00%	0.00	0.05%	0.09	0.18%	0.31	0.00%	0.00	1.05%	1.79	5.77
Sealer Line - Scenario 1 - Clear Sealer Application																
Clear Sealer (DANSPEED 424-4554)	153.96	0.00%		5.23%		0.00%		0.00%		0.00%		0.03%		0.00%		
Sealer Catalyst (873-0870)	14.88	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		
Clear Sealer (as applied)	168.84	0.00%	0.00	4.77%	35.27	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.03%	0.20	0.00%	0.00	35.47
Sealer Line - Scenario 2 - White Sealer Application																
White Sealer (DANSPEED KW-L122-0002)	153.14	7.39%		9.89%		1.73%		0.00%		0.00%		0.04%		0.00%		
Sealer Catalyst (873-0870)	12.20	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		
White Sealer (as applied)	165.34	6.74%	48.80	9.02%	65.31	1.58%	11.42	0.00%	0.00	0.00%	0.00	0.04%	0.26	0.00%	0.00	125.80
Maximum Potential Emission Rate Scenario for Sealer Line			48.80		65.31		11.42		0.00		0.00		0.26		0.00	125.80
Topcoat Line - Scenario 1 - Clear Topcoat Application																
Clear Topcoat (DANSPEED 424-4554)	153.96	0.00%		5.23%		0.00%		0.00%		0.00%		0.03%		0.00%		
Topcoat Catalyst (873-0870)	14.88	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		
Clear Topcoat (as applied)	168.84	0.00%	0.00	4.77%	35.27	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.03%	0.20	0.00%	0.00	35.47
Topcoat Line - Scenario 2 - White Topcoat Application																
White Topcoat (DANSPEED KW-L122-0002)	153.14	7.39%		9.89%		1.73%		0.00%		0.00%		0.04%		0.00%		
Topcoat Catalyst (873-0870)	12.20	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		0.00%		
White Topcoat (as applied)	165.34	6.74%	48.80	9.02%	65.31	1.58%	11.42	0.00%	0.00	0.00%	0.00	0.04%	0.26	0.00%	0.00	125.80
Maximum Potential Emission Rate Scenario for Topcoat Line			48.80		65.31		11.42		0.00		0.00		0.26		0.00	125.80
Totals			101.20		130.62		22.85		0.09		0.31		0.53		1.79	257.38

Operating Scenarios:

Scenario 1: Stain Booth + Sealer Booth w/ Clear Sealer + Topcoat Booth w/ Clear Topcoat
Scenario 2: Sealer Booth w/ White Sealer + Topcoat Booth w/ White Topcoat; No Stain Booth Operation

METHODOLOGY

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

ACRONYMS

EB = ethylbenzene
Cr CMPD = Chromium (III) Compounds
DGMBE = Diethylene Glycol Monobutyl Ether
HCOH = formaldehyde
ECME = Ethylene Glycol Monopropyl Ether

**Appendix A: Emissions Calculations
Woodworking Operation
After Significant Permit Modification No. 039-36311-00518**

**Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer**

Control Equipment Description	PM/PM10 Collection Efficiency (%)	Exhaust Flow Rate (acfm)	Outlet Grain Loading (grains/cf)	Controlled PTE of PM/PM10/PM2.5 (lbs/hr)	Controlled PTE of PM/PM10/PM2.5 (tons/yr)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)
Baghouse (BH1)	98.39%	50000	0.001247	0.53	2.34	33.19	145.39
Baghouse (BH2)	98.39%	11500	0.003742	0.37	1.62	22.91	100.35
Baghouse (BH3)	98.39%	10822	0.004980	0.46	2.02	28.69	125.67
Baghouse (BH4)	98.39%	15000	0.003593	0.46	2.02	28.69	125.68
Totals				1.83	8.00	113.49	497.09

Methodology

Potential Controlled Emissions (lbs/hr) = Outlet Loading (grains/cf) * Exhaust Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr

Potential Uncontrolled Emissions (lbs/hr) = Potential Controlled Emissions (lbs/hr) / (1 - Control Efficiency)

Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hr/yr * 1 ton/2,000 lbs

PM10 and PM2.5 emissions assumed equal to PM emissions.

Compliance with 326 IAC 6-3-2:

Allowable Emissions, $E = 4.10 * P^{0.67}$ (for weight rates up to 60,000 lb/hr)	
where	$E =$ emissions in lbs/hr
	$P =$ process weight in tons/hr
	$P =$ 716.67 lbs/hr
	$=$ 0.358 tons/hr
Allowable PM Emissions, $E =$	2.06 lbs/hr
$=$	49.5 lbs/day
$=$	9.03 tons/yr
The use of baghouses ensure compliance with the allowable emission rate.	

**Appendix A: Emissions Calculations
Air Make-Up Units and Process Heaters
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Factor (lb/MMCF)						
					PM*	PM10*	PM2.5*	SO2	NOx**	VOC	CO
					1.9	7.6	7.6	0.6	100	5.5	84.0
					Potential Emission tons/yr						
					PM*	PM10*	PM2.5*	SO2	NOx**	VOC	CO
Air Make-Up Unit	1	3.0	3.000	26.28	2.5E-02	0.100	0.100	7.9E-03	1.314	0.072	1.104
Air Make-Up Unit	1	4.136	4.136	36.23	3.4E-02	0.138	0.138	1.1E-02	1.812	0.100	1.522
Process Heaters	2	1.250	2.500	21.90	2.1E-02	0.083	0.083	6.6E-03	1.095	0.060	0.920
Process Heater	1	0.250	0.250	2.19	2.1E-03	0.008	0.008	6.6E-04	0.110	0.006	0.092
Radiant Tube Heater ISA-1	1	0.125	0.125	1.10	1.0E-03	0.004	0.004	3.3E-04	0.055	0.003	0.046
Radiant Tube Heater ISA-2	1	0.125	0.125	1.10	1.0E-03	0.004	0.004	3.3E-04	0.055	0.003	0.046
Radiant Tube Heater ISA-3	1	0.125	0.125	1.10	1.0E-03	0.004	0.004	3.3E-04	0.055	0.003	0.046
Radiant Tube Heater ISA-4	1	0.150	0.150	1.31	1.2E-03	0.005	0.005	3.9E-04	0.066	0.004	0.055
Radiant Tube Heater ISA-5	1	0.150	0.150	1.31	1.2E-03	0.005	0.005	3.9E-04	0.066	0.004	0.055
Radiant Tube Heater	1	0.125	0.125	1.10	1.0E-03	0.004	0.004	3.3E-04	0.055	0.003	0.046
Radiant Tube Heater	1	0.150	0.150	1.31	1.2E-03	0.005	0.005	3.9E-04	0.066	0.004	0.055
Radiant Tube Heater	1	0.150	0.150	1.31	1.2E-03	0.005	0.005	3.9E-04	0.066	0.004	0.055
Radiant Tube Heater	1	0.150	0.150	1.31	1.2E-03	0.005	0.005	3.9E-04	0.066	0.004	0.055
Space Heater	1	0.300	0.300	2.63	2.5E-03	0.010	0.010	7.9E-04	0.131	0.007	0.110
Space Heater	1	0.200	0.200	1.75	1.7E-03	0.007	0.007	5.3E-04	0.088	0.005	0.074
Space Heater	1	0.130	0.130	1.14	1.1E-03	0.004	0.004	3.4E-04	0.057	0.003	0.048
Totals	17		11.77		0.10	0.39	0.39	0.03	5.15	0.28	4.33

Emission Unit	Emission Factor (lb/MMCF)									
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	Potential Emission tons/yr									
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Air Make-Up Unit	2.8E-05	1.6E-05	9.9E-04	2.4E-02	4.5E-05	6.6E-06	1.4E-05	1.8E-05	5.0E-06	2.8E-05
Air Make-Up Unit	3.8E-05	2.2E-05	1.4E-03	3.3E-02	6.2E-05	9.1E-06	2.0E-05	2.5E-05	6.9E-06	3.8E-05
Process Heaters	2.3E-05	1.3E-05	8.2E-04	2.0E-02	3.7E-05	5.5E-06	1.2E-05	1.5E-05	4.2E-06	2.3E-05
Process Heaters	2.3E-06	1.3E-06	8.2E-05	2.0E-03	3.7E-06	5.5E-07	1.2E-06	1.5E-06	4.2E-07	2.3E-06
Radiant Tube Heater ISA-1	1.1E-06	6.6E-07	4.1E-05	9.9E-04	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Tube Heater ISA-2	1.1E-06	6.6E-07	4.1E-05	9.9E-04	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Tube Heater ISA-3	1.1E-06	6.6E-07	4.1E-05	9.9E-04	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Tube Heater ISA-4	1.4E-06	7.9E-07	4.9E-05	1.2E-03	2.2E-06	3.3E-07	7.2E-07	9.2E-07	2.5E-07	1.4E-06
Radiant Tube Heater ISA-5	1.4E-06	7.9E-07	4.9E-05	1.2E-03	2.2E-06	3.3E-07	7.2E-07	9.2E-07	2.5E-07	1.4E-06
Radiant Tube Heater	1.1E-06	6.6E-07	4.1E-05	9.9E-04	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Tube Heater	1.4E-06	7.9E-07	4.9E-05	1.2E-03	2.2E-06	3.3E-07	7.2E-07	9.2E-07	2.5E-07	1.4E-06
Radiant Tube Heater	1.4E-06	7.9E-07	4.9E-05	1.2E-03	2.2E-06	3.3E-07	7.2E-07	9.2E-07	2.5E-07	1.4E-06
Radiant Tube Heater	1.4E-06	7.9E-07	4.9E-05	1.2E-03	2.2E-06	3.3E-07	7.2E-07	9.2E-07	2.5E-07	1.4E-06
Space Heater	2.8E-06	1.6E-06	9.9E-05	2.4E-03	4.5E-06	6.6E-07	1.4E-06	1.8E-06	5.0E-07	2.8E-06
Space Heater	1.8E-06	1.1E-06	6.6E-05	1.6E-03	3.0E-06	4.4E-07	9.6E-07	1.2E-06	3.3E-07	1.8E-06
Space Heater	1.2E-06	6.8E-07	4.3E-05	1.0E-03	1.9E-06	2.8E-07	6.3E-07	8.0E-07	2.2E-07	1.2E-06
Totals	9.6E-05	5.5E-05	3.4E-03	8.2E-02	1.6E-04	2.3E-05	5.0E-05	6.4E-05	1.7E-05	9.6E-05

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emissions assumed equal to PM10 emissions.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

Potential Throughput (MMCF) = Combined Total Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2,000 lb/ton
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter NOx = Nitrogen Oxides DCB = Dichlorobenzene Cr = Chromium
PM10 = Particulate Matter (<10 un VOC - Volatile Organic Compounds) Pb = Lead Mn = Manganese
SO2 = Sulfur Dioxide CO = Carbon Monoxide Cd = Cadmium Ni = Nickel

**Appendix A: Emissions Calculations
Woodworking Operation - Panel Brush Cleaners**

**Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer**

Operation	Control Efficiency	PTE of PM/PM10/PM2.5 Before Controls (lbs/hr)*	PTE of PM/PM10/PM2.5 Before Controls (tons/yr)	PTE of PM/PM10/PM2.5 After Controls (lbs/hr)	PTE of PM/PM10/PM2.5 After Controls (tons/yr)
Stain Line Panel Brush Cleaner (PC1)	70.00%	0.13	0.57	0.04	0.17
Sealer Line Panel Brush Cleaner (PC2)	70.00%	0.03	0.14	0.01	0.04
Total		0.16	0.72	0.05	0.22

METHODOLOGY

Potential Emissions After Controls (lbs/hr) = Outlet Grain Loading (grains/cf) x Exhaust Flow Rate (acfm) x 1lb/7000 grains x 60 min/hr
 Potential Emissions Before Controls (lbs/hr) = Potential Emissions After Controls (lbs/hr) / (1 - Collection Efficiency)
 Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x 8760 hrs/year x 1 ton/2000 lbs

*Based on information provided by the source, the PTE Before Controls (lbs/hr) is calculated as follows based upon the actual total amount of dust collected from both the stain line and sealer line:

Calculation A	1	yd ³ dust/year	x	27	ft ³ /yd ³ =	27	ft ³ /yr
Calculation B	27	ft ³ /year	x	8.5	lb/ft ³ =	229.5	lb/yr
Calculation C	229.5	lb/yr	/	2000	hr/yr =	0.115	lb/hr
Calculation D	0.115	lb/hr	/	70.00%	(Control Efficiency) =	0.164	lb/hr (total uncontrolled PTE for both the stain line and sealer line)

Stain Line Brush Cleaner (80% of dust)	80%	0.13	lb/hr uncontrolled
Sealer Line Brush Cleaner (20% of dust)	20%	0.03	lb/hr uncontrolled

**Appendix A: Emissions Calculations
Cold Cleaner Degreaser (PW1)**

Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer

Operation	Density (lb/gal)	Gal. of Solvent (gal/yr)*	PTE for VOC (tons/year)
Cold Cleaner Degreaser (PW1)	6.7	145	0.49
Total			0.49

*Based on information provided by the source. The source uses 32 gallons/year but requests that a conservative estimate is used instead

METHODOLOGY

PTE = Density of solvent (lb/gal) x Gallons of Solvent (gal/year) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and Particulate
Adhesive Application for Assembly Operations (AA)**

**Company Name: Kountry Wood Products LLC
Source Address: 500 E Wabash Avenue, Nappanee, Indiana 46550
Part 70 Operating Permit Renewal No.: T039-36432-00518
Reviewer: Allen Reimer**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Franklin Titebond II Premium Wood Glue	9.09	52.00%	51.50%	0.50%	56.13%	43.32%	0.0150	400.00	0.10	0.05	0.27	6.54	1.19	0.00	0.10	100%

Note: Material is flow coat applied.

Total Potential to Emit 0.27 6.54 1.19 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Dan Mains
Kountry Wood Products, LLC
PO Box 530
Nappanee, IN 46550-0530

DATE: July 26, 2016

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Title V
039-36432-00518

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:
Kevin Parks
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 2/17/2016



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

July 26, 2016

TO: Nappanee Public Library

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

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

Applicant Name: Kountry Wood Products LLC
Permit Number: 039-36432-00518

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 2/17/2016

Mail Code 61-53

IDEM Staff	CDENNY 7/26/2016 Kountry Wood Products, LLC 039-36432-00518 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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3		Nappanee City Council and Mayors Office P.O. Box 29 Nappanee IN 46550 (Local Official)										
4		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
5		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
6		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)										
7		First Twelfth Capital Company, LLC First Twelfth Capital Company, LLC 15314 Harrison Road Mishawaka IN 46544 (Affected Party)										
8		Nappanee Public Library 157 N Main St Nappanee IN 46550-1956 (Library)										
9		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
10		Kevin Parks D & B Environmental 401 Lincoln Way West Osceola IN 46561 (Consultant)										
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