Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Source Modification and a
Plantwide Applicability Limitations (PAL) Renewal/
Part 70 Significant Permit Modification
for Paoli, Inc., in Orange County

Significant Source Modification No. 117-36652-00014
PAL Renewal/Significant Permit Modification No. 117-36444-00014

The Indiana Department of Environmental Management (IDEM) has received an application from Paoli, Inc., located at 201 East Martin St., Orleans, Indiana 47452, for a significant modification of its Part 70 Operating Permit Renewal issued on January 13, 2013. If approved by IDEM's Office of Air Quality (OAQ), the proposed modification would allow Paoli, Inc. to make certain changes at its existing source and allow for the renewal of its Plantwide Applicability Limitations (PAL) for VOC.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may involve Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that five (5) adhesive booths, identified #1 -#5 have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. These draft Significant Source and Significant Permit Modifications contain provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Orleans Public Library
174 North Maple Street
Orleans, Indiana 47452
and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public

meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number Significant Source Modification No. 117-36652-00014 and PAL Renewal/Significant Permit Modification No. 117-36444-00014 in all correspondence.

Comments should be sent to:

Aida DeGuzman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-4972
Or dial directly: (317) 233-4972
Fax: (317) 232-6749 attn: Aida DeGuzman
E-mail: adeguzma@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Southeast Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Aida DeGuzman of my staff at the above address.

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov
Michael R. Pence
Governor
Carol S. Comer
Commissioner

DRAFT

Jerry Roach
Paoli, Inc.
201 East Martin Street
Orleans, Indiana 47452

Re: 117-36444-00014
Significant Permit Modification to
Part 70 Renewal No.: T117-31691-00014

Dear Jerry Roach:

Paoli, Inc. was issued Part 70 Operating Permit Renewal No. T117-31691-00014 on January 3, 2013, for a stationary wood office manufacturing plant located at 201 East Martin Street, Orleans, Indiana 47452. An application requesting changes to this permit was received on November 4, 2015. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A - 40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations

Previously issued approvals for this source containing this attachment is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. 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.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

DRAFT

If you have any questions on this matter, please contact Aida DeGuzman, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-4972 or 1-800-451-6027, and ask for extension 3-4972.

Sincerely,

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - File - Orange County
Orange County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southeast Regional Office

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Paoli, Inc.
201 East Martin St
Orleans, Indiana 47452

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

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

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

Operation Permit No.: T117-31691-00014	
Issued by: /*Original Signed by:* Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 3, 2013 Expiration Date: January 3, 2018

Administrative Amendment No.: 117-35744-00014, issued on June 4, 2015

Significant Permit Modification No.: 117-36444-00014	
Issued by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: January 3, 2018

DRAFT

Table of Contents

DRAFT

DRAFT

DRAFT

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source that manufactures and coats wood office furniture.

Source Address:	201 East Martin St, Orleans, Indiana 47452
General Source Phone Number:	812-723-2791
SIC Code:	2521 (Wood Office Furniture)
County Location:	Orange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

Desk Line 1:

(a) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2.

(b) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack G1.

(c) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2A.

(d) One (1) NGR #4, identified as F1, constructed in 1994, permitted in 2016 for modification**,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) NGR #5 Booth, identified as F18, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F18.

(f) One (1) NGR #6 Booth, identified as F12, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and HVLP spray application, emissions controlled by a dry filter, exhausting to stack F12.

DRAFT

(g) One (1) NGR #7 Booth, identified as F3, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) NGR #8 Booth, identified as F47, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F47.

(i) One (1) Washcoat #1 Booth, identified as F6A, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6A.

(j) One (1) Sealer #1 Booth, identified as F6B, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6B.

(k) One (1) First Topcoat #1 Booth, identified as F6, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6.

(l) One (1) Final Topcoat # Booth, identified as F5, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F5.

(m) One (1) Repair Booth #1, identified as F13, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F13.

(n) One (1) Repair #2 Booth, identified as F4, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F4.

(o) One (1) Shade #1 Booth, identified as F16, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) Wipestain #1 Booth, identified as F46, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F46.

(q) One (1) Mix Booth, identified as F15, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F15.

Desk Line 2:

(r) One (1) NGR #9 Booth, identified as F45, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F45.

(s) One (1) NGR #10 Booth, identified as F19, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F19.

(t) One (1) NGR #11 Booth, identified as F23, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray

DRAFT

application, emissions controlled by a dry filter, exhausting to stack F23.

(u) One (1) NGR #12 Booth, identified as F22, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F22.

(v) One (1) NGR #13 Booth, identified as F28, constructed in 1999, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F28.

(w) One (1) Washcoat #2 Booth, identified as F17, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F17.

(x) One (1) Sealer Booth #2, identified as F30, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) First Topcoat #2 Booth, identified as F10, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F10.

(z) One (1) Final Topcoat #2 Booth, identified as F27, constructed in 1999, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) Repair #3 Booth, identified as F29, with a maximum capacity of 28 units per hour, constructed in 1999, permitted in 2016 for modification, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F29.

(bb) One (1) Repair #4 Booth, identified as F25, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, exhausting to stack F25.

(cc) One (1) Shade #2 Booth, identified as F24, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F24.

(dd) One (1) Wipestain #2 Booth, identified as F14, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F14.

(ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F11.

(ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F8.

Drawer Line:

(gg) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F7.

DRAFT

Chair Line 1:

(hh) One (1) NGR #1 Booth, identified as C1, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C1.

(ii) One (1) NGR #2 Booth, identified as C3, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C3.

(jj) One (1) Sealer / First Topcoat #1 Booth, identified as C10, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C10.

(kk) One (1) Final Topcoat #1 Booth, identified as C5, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C5.

(ll) One (1) Repair #1 Booth, identified as C8, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C8.

(mm) One (1) Repair #2 Booth, identified as C7, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C7.

Chair Line 2:

(nn) One (1) NGR #3 Booth, identified as C9, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 9 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C9.

(oo) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C11.

(pp) One (1) Final Topcoat #2 Booth, identified as C2, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C2.

(qq) One (1) Repair #3 Booth, identified as C6, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C6.

(rr) One (1) NGR #4 Booth, identified as U5, constructed in 1998, permitted in 2016 for modification, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U5.

(ss) One (1) Sealer / First Topcoat #3 Booth, identified as F20, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.

(tt) One (1) Final Topcoat #3 Booth, identified as F21, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.

DRAFT

(uu) One (1) Repair #4 Booth, identified as C12, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.

(vv) One (1) Repair #5 Booth, identified as F26, constructed in 1995, w permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.

(ww) One (1) Sealer / First Topcoat #2 Booth, identified as F44, constructed in 1997, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.

(xx) Five (5) Adhesive Booths, identified as Booth #1 through Booth #5, each with a maximum production rate of 1.0 unit/hour, constructed in 2013 and permitted in 2016.

Wood Milling and Assembly Operations:

(yy) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two series of baghouses, DC 4 in series with DC9 and DC 6 in series with DC10, each series of baghouses has an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, DC 4 in series with DC9 exhaust to stack 4 and DC 6 in series with DC10 exhaust to stack 6.

(zz) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two series of baghouses, DC 4 in series with DC9 and DC 6 in series with DC10, each series of baghouses has an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, DC 4 in series with DC9 exhaust to stack 4 and DC 6 in series with DC10 exhaust to stack 6.

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

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

(a) Woodworking facilities, identified as DC7, DC11, and DC12, constructed in 1996 and modified in 2015, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by three baghouses, exhausting to stack 7. [326 IAC 2-7-1(21)(G)(xxix)][326 IAC 6-3-2]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(1) Natural gas-fired space heater, capacity: 0.5 million British thermal units per hour.

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

DRAFT

(f) Other activities with particulate emissions equal to or less than 5 lb/hr or 25 lb/day: Woodworking operations and sawdust storage.

(g) Activities with VOC emissions equal to or less than 3 lb/hour or 15 lb/day: Two (2) dip tanks with a total maximum capacity of 42.125 units per hour; one (1) test booth, identified as R&D1, constructed in 1998, with a maximum capacity of 12 oz. stain per 8 hour day.

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

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

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

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

DRAFT

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, T117-31691-00014, 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:

DRAFT

(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(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

DRAFT

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(34).

DRAFT

(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 Southeast 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
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058**.**

(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

DRAFT

(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(34).

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

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

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

(e) 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)(9) 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.

DRAFT

(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 T117-31691-00014 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-

DRAFT

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,

DRAFT

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

DRAFT

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
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.

DRAFT

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)]

DRAFT

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.

DRAFT

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:

DRAFT

(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(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, 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:

DRAFT

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)][40 CFR 64][326 IAC 3-8]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

DRAFT

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

C.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.

(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(11)][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 [40 CFR 64][326 IAC 3-8][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, not subject to CAM in this permit:

DRAFT

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

(II)

(a) CAM *Response to excursions or exceedances.*

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

DRAFT

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP).. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for

DRAFT

expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

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]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

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

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

DRAFT

(CC) Copies of all reports required by the Part 70 Operating Permit.

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

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

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

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide

DRAFT

Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [326 IAC 2-2][326 IAC 2-3][[40 CFR 64][326 IAC 3-8]

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

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

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

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

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

(b) The address for report submittal is:

DRAFT

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for

review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.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.

DRAFT

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:
Desk Line 1:

(a) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2.

(b) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack G1.

(c) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2A.

(d) One (1) NGR #4, identified as F1, constructed in 1994, permitted in 2016 for modification**,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) NGR #5 Booth, identified as F18, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F18.

(f) One (1) NGR #6 Booth, identified as F12, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and HVLP spray application, emissions controlled by a dry filter, exhausting to stack F12.

(g) One (1) NGR #7 Booth, identified as F3, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) NGR #8 Booth, identified as F47, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F47.

(i) One (1) Washcoat #1 Booth, identified as F6A, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6A.

(j) One (1) Sealer #1 Booth, identified as F6B, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6B.

(k) One (1) First Topcoat #1 Booth, identified as F6, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6.

(l) One (1) Final Topcoat # Booth, identified as F5, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F5.

(m) One (1) Repair Booth #1, identified as F13, constructed in 1994, permitted in 2016 for

modification, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F13.

(n) One (1) Repair #2 Booth, identified as F4, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F4.

(o) One (1) Shade #1 Booth, identified as F16, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) Wipestain #1 Booth, identified as F46, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F46.

(q) One (1) Mix Booth, identified as F15, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F15.

Desk Line 2:

(r) One (1) NGR #9 Booth, identified as F45, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F45.

(s) One (1) NGR #10 Booth, identified as F19, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F19.

(t) One (1) NGR #11 Booth, identified as F23, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F23.

(u) One (1) NGR #12 Booth, identified as F22, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F22.

(v) One (1) NGR #13 Booth, identified as F28, constructed in 1999, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F28.

(w) One (1) Washcoat #2 Booth, identified as F17, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F17.

(x) One (1) Sealer Booth #2, identified as F30, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) First Topcoat #2 Booth, identified as F10, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F10.

(z) One (1) Final Topcoat #2 Booth, identified as F27, constructed in 1999, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP

spray application, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) Repair #3 Booth, identified as F29, with a maximum capacity of 28 units per hour, constructed in 1999, permitted in 2016 for modification, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F29.

(bb) One (1) Repair #4 Booth, identified as F25, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, exhausting to stack F25.

(cc) One (1) Shade #2 Booth, identified as F24, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F24.

(dd) One (1) Wipestain #2 Booth, identified as F14, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F14.

(ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F11.

(ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F8.

Drawer Line:

(gg) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line 1:

(hh) One (1) NGR #1 Booth, identified as C1, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C1.

(ii) One (1) NGR #2 Booth, identified as C3, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C3.

(jj) One (1) Sealer / First Topcoat #1 Booth, identified as C10, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C10.

(kk) One (1) Final Topcoat #1 Booth, identified as C5, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C5.

(ll) One (1) Repair #1 Booth, identified as C8, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C8.

(mm) One (1) Repair #2 Booth, identified as C7, constructed in 1995, permitted in 2016 for

DRAFT

modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C7.

Chair Line 2:

(nn) One (1) NGR #3 Booth, identified as C9, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 9 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C9.

(oo) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C11.

(pp) One (1) Final Topcoat #2 Booth, identified as C2, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C2.

(qq) One (1) Repair #3 Booth, identified as C6, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C6.

(rr) One (1) NGR #4 Booth, identified as U5, constructed in 1998, permitted in 2016 for modification, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U5.

(ss) One (1) Sealer / First Topcoat #3 Booth, identified as F20, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.

(tt) One (1) Final Topcoat #3 Booth, identified as F21, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.

(uu) One (1) Repair #4 Booth, identified as C12, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.

(vv) One (1) Repair #5 Booth, identified as F26, constructed in 1995, w permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.

(ww) One (1) Sealer / First Topcoat #2 Booth, identified as F44, constructed in 1997, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.

(xx) Five (5) Adhesive Booths, identified as Booth #1 through Booth #5, each with a maximum production rate of 1.0 unit/hour, constructed in 2013 and permitted in 2016.

Under 40 CFR 63, Subpart JJ, these are affected facilities that are engaged in the manufacture of wood furniture or wood furniture components.

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

DRAFT

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

D.1.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and CP117-4210-00014, issued on March 28, 1995, the BACT for VOC for facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall be the following:

(a) The surface coating facilities shall use:

(1) Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred forty-five (445) tons of VOC per twelve (12) consecutive month period;

(2) Dry filters for overspray control; and

(3) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.

(b) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures;

(c) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and

(d) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.

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

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

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

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

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate matter emissions from the surface coating facilities, including the Adhesive Booths, identified as Booth #1 through Booth #5 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

DRAFT

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

A Preventive 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)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Particulate Matter (PM) Control

in order to comply with Condition D.1.3, the dry filters for PM control shall be in proper placement and control emissions from the booths at all times when the respective booths are in operation.

D.1.7 Operator Training Program

The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

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

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

D.1.8 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

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

As an alternative to maintaining unit-specific recordkeeping for demonstrating compliance with the emission limit set forth in Condition D.1.1(a), the Permittee may use plant-wide emission information. However, if the Permittee relies on plant-wide information and in a given month the plant-wide emissions exceed the emission limit set forth in Condition D.1.1(a), the Permittee shall be deemed to exceed the emission limit contained in the condition regardless of the fact that the emissions from the units set forth in Condition D.1.1 comprise only a portion of the total emissions from the plant.

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain copies of the training program, the list of trained operators, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

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

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than 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).

DRAFT

SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

Wood Milling and Assembly Operations:

(yy) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two series of baghouses, DC 4 in series with DC9 and DC 6 in series with DC10, each series of baghouse has an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, DC 4 in series with DC9 exhaust to stack 4 and DC 6 in series with DC10 exhaust to stack 6.

(zz) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two series of baghouses, DC 4 in series with DC9 and DC 6 in series with DC10, each series of baghouses has an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, DC 4 in series with DC9 exhaust to stack 4 and DC 6 in series with DC10 exhaust to stack 6.

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

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

D.2.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology (BACT) for PM [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and CP 117-4210-00014, issued on March 28, 1995, the BACT for PM from the Wood Milling and Furniture Assembly processes shall be the following:

(a) The PM emissions from the Wood Milling and Furniture Assembly processes shall be controlled by baghouses (DC 4 in series with DC9 and DC 6 in series with DC10), each series of baghouses shall be limited to an outlet grain loadings of 0.008 grains per dry standard cubic foot (gr/dscf), with the input gas flow rates not to exceed 61,000 dry standard cubic feet per minute (dscfm).

(b) The PM emissions from the Wood Milling and Furniture Assembly operations shall be in compliance provided that the visible emissions from stacks 4 and 6 are limited to ten (10) percent opacity and there are no visible emissions from the building openings.

The equivalent particulate matter (PM) emissions for the wood milling and assembly processes are each limited to 18.3 tons per year.

D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the Wood Milling and Furniture Assembly processes shall not exceed 9.14 pounds per hour, each, when operating at a process weight rate of 6,622.65 pounds per hour.

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

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

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

DRAFT

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive 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.2.4 Particulate Matter (PM)

(a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM control shall be in operation and control emissions from the Wood Milling and Furniture Assembly operations at all times that the facilities are in operation.

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

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

D.2.5 Visible Emissions Notations [40 CFR Part 64]

(a) Daily visible emission notations of the Wood Milling and Furniture Assembly stack exhaust (stacks 4 and 6) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed at the Wood Milling and Furniture Assembly stack exhaust, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit..

D.2.6 Parametric Monitoring [40 CFR Part 64]

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the Wood Milling and Furniture Assembly operations, at least once weekly when the wood milling and furniture assembly are in operation when venting to the atmosphere.

(b) When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop of 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C-Response to Excursions or Exceedances contains the Permittee's obligation with regard

DRAFT

to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(c) The instrument used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.7 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 line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the wood milling and furniture assembly stack exhaust when venting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain the following:

(1) Weekly records of the pressure during normal operation when venting to the atmosphere; and

(2) Documentation of the dates vents are redirected.

The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

DRAFT

SECTION D.3 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

Woodworking Operations (Insignificant Activities):

(a) Woodworking facilities, identified as DC7, DC11, and DC12, constructed in 1996 and modified in 2015, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by three baghouses, exhausting to stack 7. [326 IAC 2-7-1(21)(G)(xxix)][326 IAC 6-3-2]

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

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

D.3.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

Woodworking facilities DC7, DC11, and DC12 shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

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

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

(c) Visible emissions from the baghouse shall be observed daily, when exhausting to the atmosphere, using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

(1) The baghouse shall be inspected.

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

D.3.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, woodworking facilities DC7, DC11, and DC12 shall emit less than 5.7 pounds PM per hour and 3.4 pounds PM10 per hour.

D.3.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from woodworking facilities DC7, DC11, and DC12 shall not exceed 7.37 pounds PM per hour when operating at a process weight rate of 4,800 pounds per hour.

DRAFT

The pounds per hour limitations were calculated with the following equation:

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

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

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive 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.3.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)(DD)]

(a) In order to comply with Conditions D.3.1, D.3.2 and D.3.3, the baghouses for PM control shall be in operation and control emissions from woodworking facilities DC7, DC11, and DC12 at all times that the facilities are in operation.

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

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

D.3.6 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.3.1(c) are not required, and will be replaced by the following:

(a) Daily visible emission notations of the Woodworking Process stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed at the woodworking operations, 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.

DRAFT

D.3.7 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 line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.3.8 Record Keeping Requirements

(a) To document the compliance status with Conditions D.3.1(c) and D.3.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust when exhausting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

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

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

DRAFT

SECTION D.4 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

Insignificant Activities:

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]

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

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

D.4.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the insignificant grinding and machining operations shall not exceed 7.37 pounds per hour when operating at a 4000 acfm and 0.03 outlet grain loading.

DRAFT

SECTION E.1 PLANTWIDE APPLICABILITY LIMITATION (PAL) REQUIREMENTS

Emission Unit Description:

The entire plant site is subject to the Plantwide Applicability Limitation [PAL] requirements described in this E section.

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

Source Wide Emission Limits [326 IAC 2-2.4-7(1)]

E.1.1 Emission limits [326 IAC 2-2.4-7(1)]

Volatile Organic Compounds (VOC) emissions from the entire source shall not exceed 348.58 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This provision does not supersede any other VOC emission limits contained in this permit.

General PAL Requirements [326 IAC 2-2.4-1]

E.1.2 Major New Source Review Applicability [326 IAC 2-2.4-1(c)]

Any physical change or change in the method of operation of this source is not a major modification for VOC, and not subject to the review requirements of 326 IAC 2-2 provided the actual emissions of VOC from the entire source do not exceed the emission limits in Condition E.1.1 of this permit.

E.1.3 General PAL requirements [326 IAC 2-2.4-7, 326 IAC 2-2.4-8, 326 IAC 2-2.4-9, 326 IAC 2-2.4-10, 326 IAC 2-2.4-11, 326 IAC 2-2.4-15]

(a) The requirements of this E Section became effective on May 19, 2006, the issuance date of SPM 117-22546-00014, and expire ten years after that issuance date.

(b) If the Permittee applies to renew this PAL at least six months prior to expiration of the PAL, but no earlier than eighteen months prior to the expiration of the PAL, then notwithstanding the expiration date in subsection E.1.3(a), the PAL shall continue to be effective until the revised permit with the renewed PAL is issued. The application must contain the elements described in 326 IAC 2-2.4-3 and 326 IAC 2-2.4-10.

(c) Once this PAL expires, if not otherwise renewed, then the requirements of 326 IAC 2-2.4-9 are applicable.

(d) The requirements for renewing this PAL are described in 326 IAC 2-2.4-10.

(e) The requirements for increasing the emissions limits described in Condition E.1.1 are described in 326 IAC 2-2.4-11.

(f) The requirements applicable to terminating or revoking this PAL are described in 326 IAC 2-2.4-15.

Monitoring Requirements [326 IAC 2-2.4-7(6) & (7)][326 IAC 2-2.4-12]

E.1.4 Volatile Organic Compound (VOC) Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)][326 IAC 2-2.4-12]

The Permittee shall determine actual annual emissions of VOC by employing the following techniques:

DRAFT

(a) The Permittee shall calculate VOC emissions (in tons) from all surface coating activities and related operations, each calendar month using mass balance calculations. The monthly VOC emissions are the sum of the VOC emissions from each coating or solvent used during the month. The VOC emissions from each coating or solvent will be calculated by multiplying the VOC content of a coating or solvent by the amount of that coating or solvent used during the calendar month.

(b) The mass balance calculations described in (a) above shall meet the following requirements:

(1) The Permittee shall provide a demonstrated means of validating the published content of the VOC that is contained in or created by all materials used in or at the emissions units.

(2) Assume that each emission unit emits all of the VOC that is contained in or created by that unit if it cannot otherwise be accounted for in the process.

(3) Where the vendor of a material, which is used in or at an emissions unit, publishes a range of pollutant content from the material, the Permittee must use the highest value of the range to calculate VOC emissions unless the IDEM determines there is site-specific data or a site-specific monitoring program to support another content within the range.

(c) The VOC emissions from the insignificant boilers and heaters shall be calculated using the appropriate AP-42 emission factors and the total heat input capacity or fuel usage of the units.

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

E.1.5 Record keeping requirements [326 IAC 2-7-5(3)][326 IAC 2-2.4-13]

(a) The Permittee shall retain a copy of all records necessary to determine compliance with the requirements of this E Section and Condition D.1.1(a), including a determination of each emissions unit's twelve (12) month rolling total emissions, for five years from the date of the record. Those records include, but are not limited to:

(1) The amount and VOC content of each coating material and solvent used at the source. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

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

(b) The Permittee shall retain a copy of the PAL permit application, any applications for revisions to the PAL, each annual compliance certification as required by Condition B.9 of this permit, and data relied on in the certification for the duration of the PAL plus five years.

DRAFT

E.1.6 Reporting requirements [326 IAC 2-7-5(3)][326 IAC 2-2.4-14]

(a) The Permittee shall submit a semi-annual report, containing the information described below, to the address listed in Section C - General Reporting Requirements, within thirty (30) days after the end of the calendar quarter being reported. This report requires the certification by a "responsible official" as defined by 326 IAC 2-7-1(34). The report shall include the following information:

(1) The identification of the owner and operator of the source and the permit number.

(2) Total emissions of VOC, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.4.

(3) All data relied upon, including but not limited to, any quality assurance or quality control data, in determining emissions.

(4) A list of any emissions units modified or added to the major stationary source during the reporting period.

(5) If not previously reported pursuant to another condition in this permit, the number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken.

(b) The procedures for reporting deviations from the requirements of this Section E, and the procedures for reporting emissions in excess of the limit in Condition E.1.1 are described in Section C - General Reporting Requirements. A report that describes emissions exceeding the PAL limit shall include the quantity of emissions emitted by the source. This term satisfies the requirements of 326 IAC 2-2.4-14(c).

DRAFT

SECTION E.2 NESHAP

Emissions Unit Description:

Desk Line 1:

(a) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2.

(b) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack G1.

(c) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2A.

(d) One (1) NGR #4, identified as F1, constructed in 1994, permitted in 2016 for modification**,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) NGR #5 Booth, identified as F18, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F18.

(f) One (1) NGR #6 Booth, identified as F12, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and HVLP spray application, emissions controlled by a dry filter, exhausting to stack F12.

(g) One (1) NGR #7 Booth, identified as F3, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) NGR #8 Booth, identified as F47, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F47.

(i) One (1) Washcoat #1 Booth, identified as F6A, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6A.

(j) One (1) Sealer #1 Booth, identified as F6B, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6B.

(k) One (1) First Topcoat #1 Booth, identified as F6, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6.

(l) One (1) Final Topcoat # Booth, identified as F5, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F5.

DRAFT

(m) One (1) Repair Booth #1, identified as F13, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F13.

(n) One (1) Repair #2 Booth, identified as F4, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F4.

(o) One (1) Shade #1 Booth, identified as F16, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) Wipestain #1 Booth, identified as F46, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F46.

(q) One (1) Mix Booth, identified as F15, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F15.

Desk Line 2:

(r) One (1) NGR #9 Booth, identified as F45, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F45.

(s) One (1) NGR #10 Booth, identified as F19, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F19.

(t) One (1) NGR #11 Booth, identified as F23, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F23.

(u) One (1) NGR #12 Booth, identified as F22, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F22.

(v) One (1) NGR #13 Booth, identified as F28, constructed in 1999, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F28.

(w) One (1) Washcoat #2 Booth, identified as F17, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F17.

(x) One (1) Sealer Booth #2, identified as F30, constructed in 1998, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) First Topcoat #2 Booth, identified as F10, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F10.

(z) One (1) Final Topcoat #2 Booth, identified as F27, constructed in 1999, permitted in 2016 for

DRAFT

modification, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) Repair #3 Booth, identified as F29, with a maximum capacity of 28 units per hour, constructed in 1999, permitted in 2016 for modification, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F29.

(bb) One (1) Repair #4 Booth, identified as F25, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, exhausting to stack F25.

(cc) One (1) Shade #2 Booth, identified as F24, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F24.

(dd) One (1) Wipestain #2 Booth, identified as F14, constructed in 1994, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F14.

(ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F11.

(ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F8.

Drawer Line:

(gg) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line 1:

(hh) One (1) NGR #1 Booth, identified as C1, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C1.

(ii) One (1) NGR #2 Booth, identified as C3, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C3.

(jj) One (1) Sealer / First Topcoat #1 Booth, identified as C10, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C10.

(kk) One (1) Final Topcoat #1 Booth, identified as C5, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C5.

(ll) One (1) Repair #1 Booth, identified as C8, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C8.

DRAFT

(mm) One (1) Repair #2 Booth, identified as C7, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C7.

Chair Line 2:

(nn) One (1) NGR #3 Booth, identified as C9, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 9 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C9.

(oo) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C11.

(pp) One (1) Final Topcoat #2 Booth, identified as C2, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C2.

(qq) One (1) Repair #3 Booth, identified as C6, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C6.

(rr) One (1) NGR #4 Booth, identified as U5, constructed in 1998, permitted in 2016 for modification, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U5.

(ss) One (1) Sealer / First Topcoat #3 Booth, identified as F20, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.

(tt) One (1) Final Topcoat #3 Booth, identified as F21, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.

(uu) One (1) Repair #4 Booth, identified as C12, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.

(vv) One (1) Repair #5 Booth, identified as F26, constructed in 1995, w permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.

(ww) One (1) Sealer / First Topcoat #2 Booth, identified as F44, constructed in 1997, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.

(xx) Five (5) Adhesive Booths, identified as Booth #1 through Booth #5, each with a maximum production rate of 1.0 unit/hour, constructed in 2013 and permitted in 2016.

Under 40 CFR 63, Subpart JJ, these are affected facilities that are engaged in the manufacture of wood furniture or wood furniture components.

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

DRAFT

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

E.2.1 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]

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 20-1-1 for the, emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJ in accordance with schedule in 40 CFR 63, Subpart JJ.

E.2.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR Part 63, Subpart JJ][326 IAC 20-14-1]

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 20-14-1, for the emission units listed above:

(1) 40 CFR 63.800 (except (f) and (g))
(2) 40 CFR 63.801
(3) 40 CFR 63.802 (except (b)
(4) 40 CFR 63.803
(5) 40 CFR 63.804 (except (d) and (e))
(6) 40 CFR 63.805 (except (d)(7), (d)(9), (e)(4), and (e)(6))
(7) 40 CFR 63.806
(8) 40 CFR 63.807
(9) 40 CFR 63.808
(10) Table 1
(11) Table 2
(12) Table 3
(13) Table 4
(14) Table 5
(15) Table 6

DRAFT

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

Source Name: Paoli, Inc.
Source Address: 201 East Martin St, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014

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:

DRAFT

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: Paoli, Inc.
Source Address: 201 East Martin St, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014

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:

DRAFT

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: _____

DRAFT

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

Part 70 Operating Permit
Semi-Annual Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014
Facility: Entire Source
Parameter: Plantwide Applicability Limitations (PAL) -VOC Emissions
Limit: 348.58 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Plantwide VOC Emissions	Plantwide VOC Emissions	Plantwide VOC Emissions
	This Month	Previous 11 Months	12 Month Total

Along with this report, the Permittee shall submit the information required by Condition E.1.6 in a manner consistent with that condition and Section C of the Part 70 permit.

☐ No deviation occurred in this quarter.

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

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

DRAFT

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

Part 70 QUARTERLY REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014
Facility: Spray booths F17 through F26, F44 through F47, G1, and C1 through C12
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit (PSD BACT): Less than 37 tons per month; equivalent to less than four hundred forty-five (445) tons of VOC per twelve (12) consecutive month period.

YEAR: _____

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

☐ No deviation occurred in this quarter.

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

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

DRAFT

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: Paoli, Inc.
Source Address: 201 East Martin St, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014

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

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

DRAFT

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: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and a Plantwide Applicability Limitations (PAL) Renewal/ Part 70 Significant Permit Modification

Source Description and Location

Source Name:	Paoli, Inc.
Source Location:	201 East Martin St., Orleans, Indiana 47452
County:	Orange
SIC Code:	2521 (Wood Office Furniture)
Operation Permit No.:	T 117-31691-00014
Operation Permit Issuance Date:	January 3, 2013
Significant Source Modification No.:	117-36652-00014
PAL Renewal/Significant Permit Modification No.:	117-36444-00014
Permit Reviewer:	Aida DeGuzman

County Attainment Status

The source is located in Orange 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_{10}	Unclassifiable effective November 15, 1990.
$PM_{2.5}$	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.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1] Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which 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. Orange 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) $PM_{2.5}$
Orange County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Orange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the

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

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	**Emissions** (ton/yr)
PM	77.73
PM_{10}	67.73
$PM_{2.5}$	67.73
SO_2	0.0
NO_X	0.22
VOC	419.5 (PAL)
CO	0.18
HAPs	
Worst Single HAP	>10
Total HAPs	419.5

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

(c) These emissions are based upon the TSD of Part 70 Renewal No. T117-31691-00014, issued January 1, 2013.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2014 OAQ emissions data.

Pollutant	**Emissions** (ton/yr)
PM	not reported
PM_{10}	not reported
$PM_{2.5}$	not reported
SO_2	not reported
NO_X	not reported
VOC	255
CO	not reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a permit modification application submitted on November 4, 2015 and a source modification application, submitted by Paoli, Inc. on December 22, 2015, relating to the following:

(a) The addition of five (5) Adhesive Booths, identified as Booth #1 through Booth #5, each with a maximum production rate of 1.0 unit/hour, constructed in 2013.

(b) The revision of the permit to reflect an operational change to make the process operation more efficient, which condensed eleven (11) existing process lines to five (5) process lines. This also changed the coatings used in each emission unit. The production capacity of the source will not change.

(c) The removal of Drawer Enamel Booth (F9) and all the booths comprising the UV Line from the permit since these units were removed from the source.

(d) The removal of Chair Line 3 from the permit since this unit was never constructed.

(e) The addition of baghouse DC9/10 to the Wood Milling and Assembly Operations.

(f) The Renewal of the Plantwide Applicability Limitation (PAL) for Volatile Organic Compounds (VOC).

Enforcement Issues

IDEM is aware that adhesive booths (Booth #1 through Booth #5) have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount

of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

PTE Before Controls of the Modification (New Units)	
Pollutant	**Potential To Emit** (ton/yr)
PM	39.06
PM_{10}	39.06
$PM_{2.5}$	39.06
SO_2	0.0
VOC	0.0
CO	0.0
NO_X	0.0
Single HAPs	0.0
Total HAPs	0.0

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

PTE Change of the Modified Process			
Pollutant	**PTE Before Modification** (ton/yr)	**PTE After Modification** (ton/yr)	**Increase from Modification** (ton/yr)
PM	66.53	93.79	27.26
PM_{10}	66.53	93.79	27.26
$PM_{2.5}$	66.53	93.79	27.26
SO_2	0.0	0.0	0.0
VOC	535.0	1,743.2	1,208.0
CO	0.0	0.0	0.0
NO_X	0.0	0.0	0.0
HAPs	--	--	--

Total PTE Increase due to the Modification			
Pollutant	**PTE New Emission Units** (ton/yr)	**Increase to PTE of Modified Emission Units** (ton/yr)	**Total PTE for New and Modified Units** (ton/yr)
PM	39.06	27.26	66.32
PM_{10}	39.06	27.26	66.32
$PM_{2.5}$	39.06	27.26	66.32
SO_2	0.0	0.0	0.0
VOC	0.0	1,208.0	1,208.0
CO	0.0	0.0	0.0
NO_X	0.0	0.0	0.0
HAPs	--	--	

This source modification is subject to a Significant Source Modification under 326 IAC 2-7-10.5(g)(4), because PM, PM10, PM2.5 and VOC PTE are each greater than 25 tons per year. Additionally, the modification is considered a significant permit modification pursuant to 326 IAC 2-7-12(d)(1) since it involves Title I changes, i.e. renewal of the case-by-case Plant-wide Applicability (PAL) provisions in accordance with 326 IAC 2-2.4.

Permit Level Determination – PSD -Actual to Projected Actual Test

The Permittee has provided information as part of the application for this approval that based on Actual to Projected Actual test in 326 IAC 2 2 2(d)(3), this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2 2 1. IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records and report in accordance with Source obligation in 326 IAC 2 2 8. See Appendix A of this Technical Support Document for detailed emission calculations.

	Project Emissions (ton/yr)						
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**NO_X**	**VOC**	**CO**
New Emission Units							
Adhesive Booths #1 -#5	3.91	3.91	3.91	--	--		-- --
Actual to Projected Actual - ATPA Test							
Baseline Actual Emissions (tons/year)							
Existing Modified Units (Desk Lines #1, #2, Drawer Line, Chair Lines #1, and #2)	2.23	2.23	2.23	--	--		
Projected Future Actual Emissions (tons/year)							
Existing Modified Units (Desk Lines #1, #2, Drawer Line, Chair Lines #1, and #2)	2.23	2.23	2.23	--	--	PAL [2]348.58	--
Emissions Increase ATPA	0.00	0.00	0.00	--	--		--
TOTAL EMISSIONS INCREASE FROM SOURCE MODIFICATION	**3.91**	**3.91**	**3.91**	**--**	**--**		**--**
[1]Wood Milling and Assembly Operations							
[1]Insignificant Activities							
PSD Major Source Thresholds	250	250	250	250	250	250	250
Significant Level	25	15	10	40	40	40	100

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
[1] No physical modifications and no operational changes are being made in this permitting action.
[2] New VOC PAL.

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Based on this analysis, this modification to an existing major stationary source is not major because the emissions increase of each PSD regulated pollutant, excluding GHGs, is less than the PSD significant levels and the emissions increase of GHGs from this modificatio nto an existing major PSD source are less than seventy-five thousand (75,000) tons of CO2 equivalent (CO_2e) emissions per year. Therefore, the requirements of 326 IAC 2-2, PSD are not applicable to this modification.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS):

(a) 40 CFR Part 60, Subpart EE - New Source Performance Standards for Surface Coating of Metal Furniture

This rule applies to each metal furniture surface coating operation in which organic coatings are applied, on which construction, modification, or reconstruction is commenced after November 28, 1980.

As defined in §60.311 of this subpart, surface coating operation means the system on a metal furniture surface coating line used to apply and dry or cure an organic coating on the surface of the metal furniture part or product. The surface coating operation may be a prime coat or a top coat operation and includes the coating application station(s), flash-off area, and curing oven.

40 CFR Part 60, Subpart EE is not applicable to the source because the source does not coat metal furniture. The metal parts used in the furniture assembly are purchased already finished and coated.

(b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the proposed new adhesive booths.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(b) 40 CFR Part 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations

This rule applies to 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 source is currently subject to 40 CFR Part 63, Subpart JJ. The proposed new adhesive booths #1 through #5 are also subject to 40 CFR Part 63, Subpart JJ.

Nonapplicable portions of the NESHAP will not be included in the permit. The proposed new adhesive booths #1 through #5 shall comply with the following portions of 40 CFR Part 63, Subpart JJ:

(1) 40 CFR 63.800 (except (f) and (g))

(2) 40 CFR 63.801
(3) 40 CFR 63.802 (except (b)
(4) 40 CFR 63.803
(5) 40 CFR 63.804 (except (d) and (e))
(6) 40 CFR 63.805 (except (d)(7), (d)(9), (e)(4), and (e)(6))
(7) 40 CFR 63.806
(8) 40 CFR 63.807
(9) 40 CFR 63.808
(10) Table 1 to Subpart JJ of Part 63—General Provisions Applicability to Subpart JJ
(11) Table 2 to Subpart JJ of Part 63—List of Volatile Hazardous Air Pollutants
(12) Table 3 to Subpart JJ of Part 63—Summary of Emission Limits
(13) Table 4 to Subpart JJ of Part 63—Pollutants Excluded From Use in Cleaning and Washoff Solvents
(14) Table 5 to Subpart JJ of Part 63—List of VHAP of Potential Concern Identified by Industry Table 6

(c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 20 and 40 CFR Part 63) applicable to the proposed new adhesive booth.

(d) The source shall continue to comply with the federal rules as contained in Part 70 Operating Permit Renewal No. T117-31691-00014, issued on January 3, 2013 for the existing emission units.

Compliance Assurance Monitoring (CAM):

(e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 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.

CAM Applicability Analysis							
Emission Unit	**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)
New Adhesive Booths #1 through #5	Dry Filters	Y	7.81 PM/PM10/PM2.5 each Booth	0.78 PM/PM10/PM2.5 each	100	N	NA
Modified Units:							
Desk Line 1	Dry Filters	Y	18.26 PM/PM10/PM2.5	1.46 PM/PM10/PM2.5	100	N	NA
Desk Line 2	Dry Filters	Y	10.83 PM/PM10/PM2.5	2.01 PM/PM10/PM2.5	100	N	NA
Drawer Line	Dry Filters	Y	0.01 PM/PM10/PM2.5	0.00 PM/PM10/PM2.5	100	N	NA
Chair Line1	Dry Filters	Y	39.04 PM/PM10/PM2.5	1.65 PM/PM10/PM2.5	100	N	NA
Chair Line 2	Dry Filters	Y	25.66 PM/PM10/PM2.5	1.53 PM/PM10/PM2.5	100	N	NA

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

The requirements of 40 CFR Part 64, CAM are still not applicable to the existing modified emission units since each unit has a PM/PM10/PM2.5 PTE (before controls) of less than 100 tons per year.

The CAM for VOC is still not applicable for the existing emission units because these unit do not have VOC control equipment.

State Rule Applicability Determination

326 IAC 2-2.4 (Actuals Plantwide Applicability Limitations in Attainment Areas)
Paoli currently has A Plantwide Applicability Limitation (PAL) for VOC at a rate 419.5 tons/year, which is set to expire on May 19, 2016.

326 IAC 2-2.4-6 (Establishing a 10 year actuals PAL level)

(a) The actuals PAL level for a major stationary source shall be established as the sum of the baseline actual emissions of the PAL pollutant for each emissions unit at the source plus an amount equal to the applicable significant level for the PAL pollutant under 326 IAC 2-2-1(ww) or under the CAA, whichever is lower.

(b) For establishing the actuals PAL level for a PAL pollutant, only one (1) consecutive twenty-four (24) month period shall be used to determine the baseline actual emissions in accordance with 326 IAC 2-2-1(e) for all existing emissions units. A different consecutive twenty-four (24) month period may be used for each different PAL pollutant.

(c) Emissions associated with units that were permanently shutdown after this twenty-four (24) month period must be subtracted from the PAL level.

(d) Emissions from units, except modifications to existing units, on which actual construction began after the twenty-four (24) month period must be added to the PAL level in an amount equal to the potential to emit of the units.

(e) The department shall specify a reduced PAL level, in tons per year, in the PAL permit to become effective on the future compliance date of any applicable federal or state regulatory requirement that the department is aware of prior to issuance of the PAL permit.

Proposed PAL Limit

Paoli, Inc. has proposed a baseline period of the 24 month period beginning October 2005 through September 2007 from a10 year look back in calculating the new PAL level.

Calculated PAL Level = 2 year Average Plantwide Baseline Actual Emissions + PTE from New Units - shutdown units average actual emissions + significant level for VOC

[1]October 2005 to September 2015 -10- year Look Back		
2-Year Baseline Selected - October 2005 to September 2007	500.77	tons/yr
Average Baseline Actual Emissions	250.39	tons/yr
Subtract Actual Emissions from Shutdown Units	17.19	tons/yr
*Add PTE for New Units (Adhesive Booths #1- #5)	0.00	
Add Significant VOC Level	40	tons/yr
New Calculated PAL	**273.20**	tons/yr
New Requested PAL	**348.58**	tons/yr
Current PAL (as reflected in Permit Condition E.1.1)	419.50	tons/yr

[1] 10 years prior to submitting the application.
[2]The adhesive materials used do not contain VOCs.

Pursuant to 326 IAC 2-2.4-10(d)(1), if the emissions level calculated in accordance with 326 IAC 2-2.4-6 (i.e., 273.20 tons/year) is equal to or greater than 80% of the current PAL level, IDEM may renew the new PAL at the same level of 419.5 tons/year. The new calculated PAL of 273.2 tons/year is only 70.8% < 80%. Therefore, the new PAL cannot be adjusted to the same level of 419.50 tons/year, pursuant to this rule.

Justification for New Requested PAL of 348.58 tons/year
Pursuant to 326 IAC 2-2.4-10(d)(2), the department can set the PAL at a level that it determines to be appropriate considering:
(1) air quality needs,
(2) advance in control technology
(3) anticipated economic growth in the area
(4) desire to reward or encourage the source's voluntary reductions; or
(5) other factors as specifically identified by the department.

As mentioned, the new calculated PAL of 273.20 tons/year was based on the highest 24-month period of October 2005 to September 2007, Paoli has its highest production levels in the past between 2004 and 2006, with its highest twelve-month rolling emissions total reaching 390.54 tons/year in September 2005 and 386.64 tons/year in October (see page 6 of 20 of this TSD App A). With the downturn in the economy beginning in the first quarter 2007, Paoli began to realize these effects as the product it produces is considered a luxury item. From an economic standpoint luxury items are the ones with sales demands that are directly proportional to the health of the US economy. Since nine (9) months of 2007, lowered production due to economic downturn is factored in the 2-year actual used in the new calculated PAL of 273.20 tons/year, which was based on lowered actual VOC emissions.

Based on ten (10) years projection, Paoli 's production will increase steadily as the economy and demand of Paoli's products picks up. Over the past four (4) years, with greater growth occurring

in the non-VOC product line market, i.e., 28% growth from 2014 to 2015 was seen. Regardless of growth in the non-VOC product line market, growth in VOC emitting product line is expected to remain steady due to the economies of luxury items that Paoli produces.

Expected Annual Emissions for 10-year Period for Products Emitting VOC (2015-2025)		
Year	**Expected Growth (%) of Highest Emitting VOC Product Over 2016**	**Expected VOC Emissions (tons/yr)**
2015	--	248.21
2016	--	270
2017	1.5	274.05
2018	3.05	278.24
2019	4.37	281.80
2020	6.00	286.20
2021	7.4	289.98
2022	9.12	294.62
2023	10.6	298.62
2024	12.42	303.53
2025	14.29	308.58
Significant Level		40
Requested PAL Limit		**348.58**

Note: The ten (10) year production outlook is claimed confidential.

Based on the 10- year term of the PAL, year 2025, VOC is expected to be emitted at 308.59 tons per year plus 40 tons/yr significant level, the new PAL Limit is 348.58 tons/year.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the proposed new Adhesive Booths #1 through #5 will not emit any HAP. Therefore, 326 IAC 2-4.1 does not apply.

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 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the Adhesive Booths, identified as Booth #1 through Booth #5 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The Adhesive Booths, identified as Booth #1 through Booth #5 are each controlled by dry filter.

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.

There are no changes to the following Compliance Monitoring and Determination Requirements for the PAL units:

Volatile Organic Compound (VOC) Emission Limit Determination

(a) The Permittee shall calculate VOC emissions (in tons) from all surface coating activities and related operations, each calendar month using mass balance calculations. The monthly VOC emissions are the sum of the VOC emissions from each coating or solvent used during the month. The VOC emissions from each coating or solvent will be calculated by multiplying the VOC content of a coating or solvent by the amount of that coating or solvent used during the calendar month.

(b) The mass balance calculations described in (a) above shall meet the following requirements:

(1) The Permittee shall provide a demonstrated means of validating the published content of the VOC that is contained in or created by all materials used in or at the emissions units.

(2) Assume that each emission unit emits all of the VOC that is contained in or created by that unit if it cannot otherwise be accounted for in the process.

(3) Where the vendor of a material, which is used in or at an emissions unit, publishes a range of pollutant content from the material, the Permittee must use the highest value of the range to calculate VOC emissions unless the IDEM determines there is site-specific data or a site-specific monitoring program to support another content within the range.

(c) The VOC emissions from the insignificant boilers and heaters shall be calculated using the appropriate AP-42 emission factors and the total heat input capacity or fuel usage of the units.

The current Compliance Monitoring and Determination requirements are still consistent with the rules for PAL, pursuant to 326 IAC 2-2.4-12. Compliance with these requirements assure that he source maintains emissions below the PAL level to assure that major NSR (326 IAC 2-2) does not apply.

There are no additional compliance requirements pertaining to non-PAL pollutant as a result of these modifications.

The Compliance Determination and Monitoring requirements applicable to the proposed new five (5) Adhesive Booths, identified as Booth #1 through Booth #5 are the following:

Particulate Matter (PM) Control
The dry filters for PM control shall be in proper placement and control emissions from the five (5) Adhesive Booths, identified as Booth #1 through Booth #5 at all times when the respective booths are in operation.

Operator Training Program
The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

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

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T117-31691-00014. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) Section A.1 has been amended to add the source's process description for the SIC code.

(b) Sections A.2, D.1, D.2, and E.2have been revised to include the new emission unit descriptions and to reflect the modification condensing the existing eleven (11) lines into five (5) lines. Several additional emission units that were removed from the source, or which were never constructed, have been removed from the permit.

(b) IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination, NSPS and NESHAP Requirements throughout the entire permit.

(c) The Part 70 Operating Permit terms and conditions have been updated and clarified to reflect the updated version of the rules and reflect the source major PSD status and typographical errors have been corrected throughout the permit.

(d) Sections D.2, D.3, D.4, E.1, and E.2 have been amended to change each Section Title and Section Table Title for clarification purposes.

(e) The reporting form for VOC and VHAP required by 40 CFR Part 63, Subpart JJ has been deleted since there are no VHAP emissions limitation in the permit.

Section A. Changes:

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(~~15~~ **14**)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source that manufactures and coats wood office furniture.

Source Address:	201 East Martin St, Orleans, Indiana 47452
General Source Phone Number:	812-723-2791
SIC Code:	2521 **(Wood Office Furniture)**
County Location:	Orange
Source Location Status:	Attainment for all criteria pollutants

Source Status: Part 70 Operating Permit Program
Major 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(15)]

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

Desk Line 1:

(a) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2.

(b) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack G1.

(c) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2A.

(d) One (1) **NGR #4** ~~SAP #1 Booth~~, identified as F1, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) **NGR #5** ~~SAP #2~~ Booth, identified as F18, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F18.

(f) One (1) **NGR #6** ~~SAP #3~~ Booth, identified as F12, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and HVLP spray application, emissions controlled by a dry filter, exhausting to stack F12.

(g) One (1) **NGR #7** ~~Washcoat~~ Booth, identified as F3, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) **NGR #8** ~~Washcoat /SAP Stain~~ Booth, identified as F47, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F47.

(i) One (1) **Washcoat** ~~Topcoat~~ #1 Booth, identified as F6A, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6A.

(j) One (1) **Sealer #1** ~~Topcoat #2~~ Booth, identified as F6B, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6B.

(k) One (1) **First** Topcoat #**1** ~~3~~ Booth, identified as F6, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6.

(l) One (1) **Final Topcoat #1** ~~Sealer~~ Booth, identified as F5, constructed in 1994, **permitted**

in 2016 for modification, with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F5.

(m) One (1) Repair Booth **#1**, identified as F13, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F13.

(n) One (1) **Repair #2** ~~Wipestain~~ Booth, identified as F4, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F4.

~~Desk Line 2:~~

(o) One (1) **Shade** ~~NGR~~ #1 Booth, identified as F16, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) **Wipestain #1** ~~NGR~~ Booth, identified as F46, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F46.

(q) One (1) **Mix** ~~SAP~~ Booth, identified as F15, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F15.

Desk Line 2:

(r) One (1) **NGR #9** ~~SAP~~ Booth, identified as F45, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F45.

(s) One (1) **NGR #10** ~~Wipestain~~ Booth, identified as F19, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F19.

(t) One (1) **NGR #11** ~~Topcoat #1and #3~~ Booth, identified as F23, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F23.

(u) One (1) **NGR #12** ~~Topcoat #2 and Sealer~~ Booth, identified as F22, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F22.

(v) One (1) **NGR #13** ~~Topcoat #2 and Sealer~~ Booth, identified as F28, constructed in 1999, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F28.

(w) One (1) Washcoat **#2** Booth, identified as F17, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F17.

(x) One (1) **Sealer** ~~Repair~~ Booth **#2**, identified as F30, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) **First Topcoat #2** ~~Repair~~ Booth, identified as F10, constructed in 1994,

permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F10.

~~Desk Line 3:~~

(z) One (1) **Final Topcoat #2** ~~Wipestain~~ Booth, identified as F27, constructed in 1999, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) **Repair #3** ~~Topcoat #1 and #3~~ Booth, identified as F29, with a maximum capacity of 28 units per hour, constructed in 1999, **permitted in 2016 for modification,** using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F29.

~~Desk Line 4:~~

(bb) One (1) **Repair #4** ~~Topcoat and Sealer~~ Booth, identified as F25, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, exhausting to stack F25.

(cc) One (1) **Shade #2** ~~Repair~~ Booth, identified as F24, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F24.

~~Desk Line 5:~~

(dd) One (1) **Wipestain #2** ~~SAP/NGR #1~~ Booth, identified as F14, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F14.

(ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F11.

(ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F8.

~~Desk Line 6:~~

~~(gg) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.~~

~~(hh) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.~~

~~(ii) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.~~

~~(jj) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.~~

~~(kk) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of~~

~~1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.~~

Drawer Line:

~~(ll) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F9.~~

(~~mm~~ **gg**)One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line **1**:

(~~nn~~ **hh**) One (1) **NGR #1** ~~SAP~~ Booth, identified as C1, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C1.

(~~oo~~ **ii**) One (1) **NGR #2** ~~SAP/NGR #1~~ Booth, identified as C3, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C3.

(~~pp~~ **jj**) One (1) **Sealer / First Topcoat #1** ~~SAP/NGR #3~~ Booth, identified as C10, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C10.

(~~qq~~ **kk**) One (1) **Final Topcoat #1** ~~Wipestain~~ Booth, identified as C5, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C5.

(~~rr~~ **ll**) One (1) **Repair** ~~Sealer~~ #1 Booth, identified as C8, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C8.

(~~ss~~ **mm**)One (1) **Repair #2** ~~Topcoat #1 and Sealer #2~~ Booth, identified as C7, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C7.

Chair Line 2:

(~~tt~~**nn**) One (1) **NGR #3** ~~Repair~~ Booth, identified as C9, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 9 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C9.

(~~uu~~**oo**) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C11.

~~Chair Line 2:~~

(~~vv~~**pp**) One (1) **Final Topcoat #2** ~~NGR~~ Booth, identified as C2, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C2.

(~~ww~~**qq**) One (1) **Repair #3** ~~Topcoat #2~~ Booth, identified as C6, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C6.

(~~xx~~**rr**) One (1) **NGR #4** ~~Wipestain~~ Booth, identified as U5, constructed in 1998, **permitted in 2016 for modification,** using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U5.

(ss) One (1) Sealer / First Topcoat #3 Booth, identified as F20, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.

(tt) One (1) Final Topcoat #3 Booth, identified as F21, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.

(uu) One (1) Repair #4 Booth, identified as C12, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.

(vv) One (1) Repair #5 Booth, identified as F26, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.

(ww) One (1) Sealer / First Topcoat #2 Booth, identified as F44, constructed in 1997, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.

(xx) Five (5) Adhesive Booths, identified as Booth #1 through Booth #5, each with a maximum production rate of 1.0 unit/hour, constructed in 2013 and permitted in 2016.

~~UV Line:~~

~~(yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, using HVLP spray application, emissions controlled by water pans, exhausting to stack U1.~~

~~(zz) One (1) Stain and Washcoat Booth, identified as U2, constructed in 1998, using HVLP spray application, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.~~

~~(aaa) One (1) Sealer Booth, identified as U4, constructed in 1998, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U4.~~

~~Chair Line 3~~

~~(bbb) One (1) Washcoat Booth, identified as C4, constructed in 1995 and modified in 2010, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C4.~~

~~(ccc) One (1) NGR Booth, identified as U3, constructed in 1998 and modified in 2010, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U3.~~

~~(ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998 and modified in 2010, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U6.~~

Wood Milling and Assembly Operations:

(**yy**~~eee~~) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two **series of** baghouses, DC 4 **in series with DC9** and DC 6 **in series with DC10**, **each series of baghouses** ~~with~~ **has** an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, **DC 4 in series with DC9** ~~exhausting~~ exhaust to stack~~s~~ 4~~,~~ and **DC 6 in series with DC10 exhaust to stack** 6.

(**zz**~~fff~~) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two **series of** baghouses, DC 4 **in series with DC9** and DC 6 **in series with DC10**, **each series of baghouses** ~~with~~ **has** an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, **DC 4 in series with DC9** ~~exhausting~~ exhaust to stack~~s~~ 4~~,~~ and **DC 6 in series with DC10 exhaust to stack** 6.

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

This stationary source also consists of **the following** insignificant activities, as defined in 326 IAC 2-7-1(21~~) that have applicable requirements.~~:

***

Section B Changes:

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(~~34~~**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(~~34~~**35**).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

***

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~~**5**
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

***

(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(~~34~~**35**.

B.10 Preventive Maintenance Plan [326 IAC 2-7-5**(12)]** (~~1),(3) and (13)~~][~~326 IAC 2-7-6(1) and (6)~~][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(~~34~~**35**).

The Permittee shall implement the PMPs.

***

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(~~34~~**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.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(~~34~~**35**).

***

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(~~40~~ **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(~~34~~**35**).

***

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(~~34~~**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.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),~~(c),~~ or (~~e~~ **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~~ **5**
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), ~~(c)(1),~~ and ~~(e)(2~~) **(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 -7-20(b)(1)~~, (c)(1),~~ and ~~(e)(2~~) **(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(~~36~~ **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:
***

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(~~34~~**35**).

***

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

***

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(~~34~~**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)]

SECTION C Changes:

***

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

***

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(~~34~~**35**).

***

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(~~34~~**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(~~34~~**35**).

***

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)][40 CFR 64][326 IAC 3-8]

(a) **For new units:**
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance ~~or of initial start-up, whichever is later~~ 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 ~~or the date of initial startup, whichever is later~~ 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(~~34~~**35**).

~~Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.~~

(~~b~~**c**) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

C.12 Risk Management Plan [326 IAC 2-7-5(~~12~~ **11**)] [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 [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, **not subject to CAM**, in this permit:

(II)

(a) CAM *Response to excursions or exceedances.*

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal

without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a ~~QIP~~ **Quality Improvement Plan (QIP).** The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(~~a)(2~~ **c**) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

***

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(~~a)(2~~ **c**) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for

expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

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

***

(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(~~34~~**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~~ **Pursuant to** 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(~~32~~ **33**) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

***

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(~~34~~**35**).

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

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

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

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

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

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

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

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

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] **[326 IAC 2-2][326 IAC 2-3]** [40 CFR 64][326 IAC 3-8]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~34~~**35**) . A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

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

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any “project” (as defined in

326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Desk Line 1:

(a) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2.

(b) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack G1.

(c) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2A.

(d) One (1) **NGR #4** ~~SAP #1~~ ~~Booth~~, identified as F1, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) **NGR #5** ~~SAP #2~~ Booth, identified as F18, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F18.

(f) One (1) **NGR #6** ~~SAP #3~~ Booth, identified as F12, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and HVLP spray application, emissions controlled by a dry filter, exhausting to stack F12.

(g) One (1) **NGR #7** ~~Washcoat~~ Booth, identified as F3, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) **NGR #8** ~~Washcoat /SAP Stain~~ Booth, identified as F47, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F47.

(i) One (1) **Washcoat** ~~Topcoat~~ #1 Booth, identified as F6A, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6A.

(j) One (1) **Sealer #1** ~~Topcoat #2~~ Booth, identified as F6B, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6B.

(k) One (1) **First** Topcoat #**1** ~~3~~ Booth, identified as F6, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6.

(l) One (1) **Final Topcoat #1** ~~Sealer~~ Booth, identified as F5, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per

hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F5.

(m) One (1) Repair Booth **#1**, identified as F13, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F13.

(n) One (1) **Repair #2** ~~Wipestain~~ Booth, identified as F4, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F4.

~~Desk Line 2:~~

(o) One (1) **Shade** ~~NGR~~ #1 Booth, identified as F16, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) **Wipestain #1** ~~NGR~~ Booth, identified as F46, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F46.

(q) One (1) **Mix** ~~SAP~~ Booth, identified as F15, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F15.

Desk Line 2:

(r) One (1) **NGR #9** ~~SAP~~ Booth, identified as F45, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F45.

(s) One (1) **NGR #10** ~~Wipestain~~ Booth, identified as F19, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F19.

(t) One (1) **NGR #11** ~~Topcoat #1and #3~~ Booth, identified as F23, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F23.

(u) One (1) **NGR #12** ~~Topcoat #2 and Sealer~~ Booth, identified as F22, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F22.

(v) One (1) **NGR #13** ~~Topcoat #2 and Sealer~~ Booth, identified as F28, constructed in 1999, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F28.

(w) One (1) Washcoat **#2** Booth, identified as F17, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F17.

(x) One (1) **Sealer** ~~Repair~~ Booth **#2**, identified as F30, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) **First Topcoat #2** ~~Repair~~ Booth, identified as F10, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F10.

~~Desk Line 3:~~

(z) One (1) **Final Topcoat #2** ~~Wipestain~~ Booth, identified as F27, constructed in 1999, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) **Repair #3** ~~Topcoat #1 and #3~~ Booth, identified as F29, with a maximum capacity of 28 units per hour, constructed in 1999, **permitted in 2016 for modification,** using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F29.

~~Desk Line 4:~~

(bb) One (1) **Repair #4** ~~Topcoat and Sealer~~ Booth, identified as F25, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, exhausting to stack F25.

(cc) One (1) **Shade #2** ~~Repair~~ Booth, identified as F24, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F24.

~~Desk Line 5:~~

(dd) One (1) **Wipestain #2** ~~SAP/NGR #1~~ Booth, identified as F14, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F14.

(ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F11.

(ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F8.

~~Desk Line 6:~~

~~(gg) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.~~

~~(hh) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.~~

~~(ii) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.~~

~~(jj) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by~~

~~a dry filter, exhausting to stack F26.~~

~~(kk) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.~~

Drawer Line:

~~(ll) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F9.~~

(~~mm~~ **gg**)One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line **1**:

(~~nn~~ **hh**) One (1) **NGR #1** ~~SAP~~ Booth, identified as C1, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C1.

(~~oo~~ **ii**) One (1) **NGR #2** ~~SAP/NGR #1~~ Booth, identified as C3, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C3.

(~~pp~~ **jj**) One (1) **Sealer / First Topcoat #1** ~~SAP/NGR #3~~ Booth, identified as C10, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C10.

(~~qq~~ **kk**) One (1) **Final Topcoat #1** ~~Wipestain~~ Booth, identified as C5, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C5.

(~~rr~~ **ll**) One (1) **Repair** ~~Sealer~~ #1 Booth, identified as C8, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C8.

(~~ss~~ **mm**)One (1) **Repair #2** ~~Topcoat #1 and Sealer #2~~ Booth, identified as C7, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C7.

Chair Line 2:

(~~tt~~**nn**) One (1) **NGR #3** ~~Repair~~ Booth, identified as C9, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 9 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C9.

(~~uu~~**oo**) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C11.

~~Chair Line 2:~~

(~~vv~~**pp**) One (1) **Final Topcoat #2** ~~NGR~~ Booth, identified as C2, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C2.

(~~ww~~**qq**) One (1) **Repair #3** ~~Topcoat #2~~ Booth, identified as C6, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C6.

(~~xx~~**rr**) One (1) **NGR #4** ~~Wipestain~~ Booth, identified as U5, constructed in 1998, **permitted in 2016 for modification,** using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U5.

(ss) One (1) Sealer / First Topcoat #3 Booth, identified as F20, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.

(tt) One (1) Final Topcoat #3 Booth, identified as F21, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.

(uu) One (1) Repair #4 Booth, identified as C12, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.

(vv) One (1) Repair #5Booth, identified as F26, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.

(ww) One (1) Sealer / First Topcoat #2Booth, identified as F44, constructed in 1997, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.

(xx) Five (5) Adhesive Booths, identified as Booth #1 through Booth #5, each with a maximum production rate of 1.0 unit/hour, constructed in 2013 and permitted in 2016.

~~UV Line:~~

~~(yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, using HVLP spray application, emissions controlled by water pans, exhausting to stack U1.~~

~~(zz) One (1) Stain and Washcoat Booth, identified as U2, constructed in 1998, using HVLP spray application, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.~~

~~(aaa) One (1) Sealer Booth, identified as U4, constructed in 1998, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U4.~~

~~Chair Line 3~~

~~(bbb) One (1) Washcoat Booth, identified as C4, constructed in 1995 and modified in 2010, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C4.~~

~~(ccc) One (1) NGR Booth, identified as U3, constructed in 1998 and modified in 2010, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U3.~~

~~(ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998 and modified in 2010, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U6.~~

Under 40 CFR 63, Subpart JJ, these are affected facilities that are engaged in the manufacture of wood furniture or wood furniture components.

(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) BACT~~ **Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC)** [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and CP117-4210-00014, issued on March 28, 1995, the BACT for VOC for ~~In order to comply with 326 IAC 2-2-3,~~ facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall ~~comply with~~ **be** the following:

(a) The surface coating facilities shall use:

(1) Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred forty-five (445) tons of VOC per twelve (12) consecutive month period;

(2) Dry filters for overspray control; and

(3) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.

(b) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures;

(c) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and

(d) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.

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

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

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of

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

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d)**,** the particulate matter emissions from the surface coating facilities, **including the Adhesive Booths, identified as Booth #1 through Booth #5** shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, **and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

A Preventive 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)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

****

SECTION D.2 ~~FACILITY~~ **EMISSION UNIT** OPERATION CONDITIONS

~~Facility Description [326 IAC 2-7-5(15)]:~~ **Emission Unit Description:**

Wood Milling and Assembly Operations:

(**yy**~~eee~~) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two **series of** baghouses, DC 4 **in series with DC9**~~,~~ and DC 6 **in series with DC10**, **each series of baghouses** ~~with~~ **has** an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, **DC 4 in series with DC9** ~~exhausting~~ exhaust to stack~~s~~ 4~~,~~ and **DC 6 in series with DC10 exhaust to stack** 6.

(**zz**~~fff~~) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two **series of** baghouses, DC 4 **in series with DC9**~~,~~ and DC 6 **in series with DC10**, **each series of baghouses** ~~with~~ **has** an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, **DC 4 in series with DC9** ~~exhausting~~ exhaust to stack~~s~~ 4~~,~~ and **DC 6 in series with DC10 exhaust to stack** 6.

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

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

D.2.1 **Prevention of Significant Deterioration (PSD) -** Best Available Control Technology (BACT) **for PM** [326 IAC 2-2-3]

Pursuant to **326 IAC 2-2-3 (Control Technology Review; Requirements) and** CP 117-4210-00014, issued on March 28, 1995, the **BACT for PM from the Wood Milling and Furniture Assembly processes shall be the following:**

(a) The PM emissions from the Wood Milling and Furniture Assembly processes shall

be controlled by baghouses (DC 4 in series with DC9 and DC 6 in series with DC10), **each series of baghouses shall be limited to an outlet grain loadings of 0.008 grains per dry standard cubic foot (gr/dscf), with the input gas flow rates not to exceed 61,000 dry standard cubic feet per minute (dscfm).**

(b) The PM emissions from the Wood Milling and Furniture Assembly operations shall be in compliance provided that the visible emissions from stacks 4 and 6 are limited to ten (10) percent opacity and there are no visible emissions from the building openings.

~~baghouses have been determined to be BACT for the Wood Milling and Furniture Assembly processes. Pursuant to BACT, baghouses used for the Wood Milling and Furniture Assembly processes, the allowable outlet grain loadings from baghouses DC4 and DC6 are 0.008 grains per dry standard cubic foot (gr/dscf) each, with the input gas flow rates not to exceed 61,000 dry standard cubic feet per minute (dscfm) each. The PM emissions from the Wood Milling and Furniture Assembly operations shall be in compliance provided that the visible emissions from stacks 4 and 6 are limited to ten (10) percent opacity and there are no visible emissions from the building openings.~~

The equivalent particulate matter (PM) emissions for the wood milling and assembly processes are each limited to 18.3 tons per year.

D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the Wood Milling and Furniture Assembly processes shall not exceed 9.14 pounds per hour, each, when operating at a process weight rate of 6,622.65 pounds per hour.

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

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

A Preventive 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.2.4 Particulate Matter (PM)

(a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM control shall be in operation and control emissions from the Wood Milling and Furniture Assembly operations at all times that the facilities are in operation.

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

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

D.2.5 Visible Emissions Notations [40 CFR Part 64]

(a) Daily visible emission notations of the Wood Milling and Furniture Assembly stack exhaust (stacks 4 and 6) shall be performed during normal daylight operations when

exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed at the Wood Milling and Furniture Assembly stack exhaust, the Permittee shall take reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit..

D.2.6 Parametric Monitoring [40 CFR Part 64]

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the Wood Milling and Furniture Assembly operations, at least once weekly when the wood milling and furniture assembly are in operation when venting to the atmosphere.

(b) When for any one reading, the pressure drop across the baghouse is outside the normal range, **the Permittee shall take a reasonable response**. **The normal range for these units is a pressure drop** of 1.0 and 6.0 inches of water **unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.** ~~or a range established during the latest stack test, the Permittee shall take reasonable steps.~~ Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(c) The instrument used for determining the pressure **drop** shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.7 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 line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the wood milling and furniture assembly stack exhaust when venting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain the following:

(1) Weekly records of the pressure during normal operation when venting to the atmosphere; and

(2) Documentation of the dates vents are redirected.

The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

SECTION D.3 ~~FACILITY~~ **EMISSION UNIT** OPERATION CONDITIONS

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

Woodworking Operations **(Insignificant Activities)**:

(a) Woodworking facilities, identified as DC7, DC11, and DC12, constructed in 1996 and modified in 2015, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by three baghouses, exhausting to stack 7. [326 IAC 2-7-1(21)(G)(xxix)][326 IAC 6-3-2]

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

****

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~ **12**)]

A Preventive 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.3.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)(DD)]

(a) In order to comply with Conditions D.3.1, D.3.2 and D.3.3, the baghouses for PM control shall be in operation and control emissions from woodworking facilities DC7, DC11, and DC12 at all times that the facilities 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.

****

SECTION D.4 ~~FACILITY~~ **EMISSION UNIT** OPERATION CONDITIONS

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

Insignificant Activities:

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]

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

***

SECTION E.1 PLANTWIDE APPLICABILITY LIMITATION **(PAL)** REQUIREMENTS

~~Facility Description [326 IAC 2-7-5(15)]~~ **Emission Unit Description:**

The entire plant site is subject to the Plantwide Applicability Limitation [PAL] requirements described in this E section.

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

Source Wide Emission Limits [326 IAC 2-2.4-7(1)]

E.1.1 Emission limits [326 IAC 2-2.4-7(1)]

Volatile Organic Compounds (VOC) emissions from the entire source shall not exceed ~~419.5~~ **348.58** tons per twelve (12) consecutive month period with compliance determined at the end of each month. This provision does not supersede any other VOC emission limits contained in this permit.

***

SECTION E.2 ~~EMISSIONS UNIT OPERATION CONDITIONS~~ **NESHAP**

Emissions Unit Description:

Desk Line 1:

(a) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2.

(b) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack G1.

(c) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F2A.

(d) One (1) **NGR #4** ~~SAP #1~~ ~~Booth~~, identified as F1, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) **NGR #5** ~~SAP #2~~ Booth, identified as F18, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F18.

(f) One (1) **NGR #6** ~~SAP #3~~ Booth, identified as F12, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and HVLP spray application, emissions controlled by a dry filter, exhausting to stack F12.

(g) One (1) **NGR #7** ~~Washcoat~~ Booth, identified as F3, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) **NGR #8** ~~Washcoat /SAP Stain~~ Booth, identified as F47, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F47.

(i) One (1) **Washcoat** ~~Topcoat~~ #1 Booth, identified as F6A, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6A.

(j) One (1) **Sealer #1** ~~Topcoat #2~~ Booth, identified as F6B, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour , using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6B.

(k) One (1) **First** Topcoat #**1** ~~3~~ Booth, identified as F6, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F6.

(l) One (1) **Final Topcoat #1** ~~Sealer~~ Booth, identified as F5, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F5.

(m) One (1) Repair Booth **#1**, identified as F13, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F13.

(n) One (1) **Repair #2** ~~Wipestain~~ Booth, identified as F4, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F4.

~~Desk Line 2:~~

(o) One (1) **Shade** ~~NGR~~ #1 Booth, identified as F16, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F16.

(p) One (1) **Wipestain #1** ~~NGR~~ Booth, identified as F46, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F46.

(q) One (1) **Mix** ~~SAP~~ Booth, identified as F15, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F15.

Desk Line 2:

(r) One (1) **NGR #9** ~~SAP~~ Booth, identified as F45, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F45.

(s) One (1) **NGR #10** ~~Wipestain~~ Booth, identified as F19, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F19.

(t) One (1) **NGR #11** ~~Topcoat #1and #3~~ Booth, identified as F23, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F23.

(u) One (1) **NGR #12** ~~Topcoat #2 and Sealer~~ Booth, identified as F22, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F22.

(v) One (1) **NGR #13** ~~Topcoat #2 and Sealer~~ Booth, identified as F28, constructed in 1999, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F28.

(w) One (1) Washcoat **#2** Booth, identified as F17, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F17.

(x) One (1) **Sealer** ~~Repair~~ Booth **#2**, identified as F30, constructed in 1998, **permitted in 2016 for modification,** with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F30.

(y) One (1) **First Topcoat #2** ~~Repair~~ Booth, identified as F10, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F10.

~~Desk Line 3:~~

(z) One (1) **Final Topcoat #2** ~~Wipestain~~ Booth, identified as F27, constructed in 1999, **permitted in 2016 for modification,** with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F27.

(aa) One (1) **Repair #3** ~~Topcoat #1 and #3~~ Booth, identified as F29, with a maximum capacity of 28 units per hour, constructed in 1999, **permitted in 2016 for modification,** using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F29.

~~Desk Line 4:~~

(bb) One (1) **Repair #4** ~~Topcoat and Sealer~~ Booth, identified as F25, constructed in 1995,

permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, exhausting to stack F25.

(cc) One (1) **Shade #2** ~~Repair~~ Booth, identified as F24, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F24.

~~Desk Line 5:~~

(dd) One (1) **Wipestain #2** ~~SAP/NGR #1~~ Booth, identified as F14, constructed in 1994, **permitted in 2016 for modification,** with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F14.

(ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F11.

(ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F8.

~~Desk Line 6:~~

~~(gg) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.~~

~~(hh) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.~~

~~(ii) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.~~

~~(jj) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.~~

~~(kk) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.~~

Drawer Line:

~~(ll) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F9.~~

(~~mm~~ **gg**)One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line **1**:

(~~nn~~ **hh**) One (1) **NGR #1** ~~SAP~~ Booth, identified as C1, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 67.5 units per hour, using HVLP spray

application, emissions controlled by a dry filter, exhausting to stack C1.

(~~oo~~ **ii**) One (1) **NGR #2** ~~SAP/NGR #1~~ Booth, identified as C3, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C3.

(~~pp~~ **jj**) One (1) **Sealer / First Topcoat #1** ~~SAP/NGR #3~~ Booth, identified as C10, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C10.

(~~qq~~ **kk**) One (1) **Final Topcoat #1** ~~Wipestain~~ Booth, identified as C5, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C5.

(~~rr~~ **ll**) One (1) **Repair** ~~Sealer~~ #1 Booth, identified as C8, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C8.

(~~ss~~ **mm**)One (1) **Repair #2** ~~Topcoat #1 and Sealer #2~~ Booth, identified as C7, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C7.

Chair Line 2:

(~~tt~~**nn**) One (1) **NGR #3** ~~Repair~~ Booth, identified as C9, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 9 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C9.

(~~uu~~**oo**) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C11.

~~Chair Line 2:~~

(~~vv~~**pp**) One (1) **Final Topcoat #2** ~~NGR~~ Booth, identified as C2, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 67.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C2.

(~~ww~~**qq**) One (1) **Repair #3** ~~Topcoat #2~~ Booth, identified as C6, constructed in 1995, **permitted in 2016 for modification,** with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C6.

(~~xx~~**rr**) One (1) **NGR #4** ~~Wipestain~~ Booth, identified as U5, constructed in 1998, **permitted in 2016 for modification,** using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U5.

(ss) One (1) Sealer / First Topcoat #3 Booth, identified as F20, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 3.125 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F20.

(tt) One (1) Final Topcoat #3 Booth, identified as F21, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using

HVLP spray application, emissions controlled by a dry filter, exhausting to stack F21.

(uu) One (1) Repair #4 Booth, identified as C12, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C12.

(vv) One (1) Repair #5Booth, identified as F26, constructed in 1995, permitted in 2016 for modification, with a maximum capacity of 6.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F26.

(ww) One (1) Sealer / First Topcoat #2 Booth, identified as F44, constructed in 1997, permitted in 2016 for modification, with a maximum capacity of 1.25 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack F44.

(xx) Five (5) Adhesive Booths, identified as Booth #1 through Booth #5, each with a maximum production rate of 1.0 unit/hour, constructed in 2013 and permitted in 2016.

~~UV Line:~~

~~(yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, using HVLP spray application, emissions controlled by water pans, exhausting to stack U1.~~

~~(zz) One (1) Stain and Washcoat Booth, identified as U2, constructed in 1998, using HVLP spray application, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.~~

~~(aaa) One (1) Sealer Booth, identified as U4, constructed in 1998, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U4.~~

~~Chair Line 3~~

~~(bbb) One (1) Washcoat Booth, identified as C4, constructed in 1995 and modified in 2010, with a maximum capacity of 87.5 units per hour, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack C4.~~

~~(ccc) One (1) NGR Booth, identified as U3, constructed in 1998 and modified in 2010, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U3.~~

~~(ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998 and modified in 2010, using HVLP spray application, emissions controlled by a dry filter, exhausting to stack U6.~~

Under 40 CFR 63, Subpart JJ, these are affected facilities that are engaged in the manufacture of wood furniture or wood furniture components.

(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.2.1 General Provisions Relating to ~~NESHAP JJ~~ **National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63** [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.**1**~~80~~0, the Permittee shall comply with the provisions of 40 CFR Part 63,

Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the ~~surface coating operations~~, **emission units listed above**, **except** as **otherwise** ~~as~~ specified in ~~Table 1 of~~ 40 CFR Part 63, Subpart JJ in accordance with schedule in 40 CFR 63, Subpart JJ.

E.2.2 ~~NESHAP Subpart JJ Requirements~~ **Wood Furniture Manufacturing Operations NESHAP** [40 CFR Part 63, Subpart JJ] [326 IAC 20-14-1]

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 20-14-1, for the ~~surface coating operations~~, **emission units listed above** ~~copy of the rule is included as Attachment A. This source is subject to the following portions of NESHAP Subpart JJ:~~

(1) 40 CFR 63.800 (except (f) and (g))
(2) 40 CFR 63.801
(3) 40 CFR 63.802 (except (b)
(4) 40 CFR 63.803
(5) 40 CFR 63.804 (except (d) and (e))
(6) 40 CFR 63.805 (except (d)(7), (d)(9), (e)(4), and (e)(6))
(7) 40 CFR 63.806
(8) 40 CFR 63.807
(9) 40 CFR 63.808
(10) Table 1
(11) Table 2
(12) Table 3
(13) Table 4
(14) Table 5
(15) Table 6

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: Paoli, Inc.
Source Address: 201 East Martin St, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014

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.

***

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Operating Permit
VOC and VHAP usage - Wood Furniture NESHAP
Semi-Annual Report

Source Name: Paoli, Inc.
Source Address: 201 East Martin St, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014
Facility: All surface coating booths
Parameter: VOC and VHAPs - NESHAP

Limit:
(1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinners - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner/Solvent mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

□ No deviation occurred in this 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
Semi-Annual Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014
Facility: Entire Source
Parameter: ~~Total plantwide VOC emissions~~ **Plantwide Applicability Limitations (PAL) - VOC Emissions**
Limit: ~~419~~ **348.58** tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Plantwide VOC Emissions	Plantwide VOC Emissions	Plantwide VOC Emissions
	This Month	Previous 11 Months	12 Month Total
~~Month 1~~			
~~Month 2~~			
~~Month 3~~			
~~Month 4~~			
~~Month 5~~			
~~Month 6~~			

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

Part 70 QUARTERLY REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, Indiana 47452
Part 70 Permit No.: T117-31691-00014
Facility: Spray booths F17 through F26, F44 through F47, G1, and C1 through C12
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit **(PSD BACT):** Less than 37 tons per month; equivalent to less than four hundred forty-five (445) tons of VOC per twelve (12) consecutive month period.

YEAR: _____

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

☐ No deviation occurred in this quarter.

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

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

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 117-36652-00014 and Significant Permit Modification No. 117-36444-00014. The staff recommends to the Commissioner that this Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Aida DeGuzman 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) 233-4972 or toll free at 1-800-451-6027 extension 3-4972.

(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.

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

SOURCEWIDE UNCONTROLLED PTE (tons/year)							
Unit Name	PM	PM10	PM2.5	SO2	VOC	NOx	CO
Adhesive Booths #1 -#5	39.06	39.06	39.06	--	0.0	--	--
Desk Line 1	18.26	18.26	18.26	--	761.0	--	--
Desk Line 2	10.83	10.83	10.83	--	535.1	--	--
Drawer Line	0.01	0.01	0.01	--	48.6	--	--
Chair Line 1	39.04	39.04	39.04	--	1,208.4	--	--
Chair Line 2	25.66	25.66	25.66	--	772.4	--	--
Wood Milling and Assembly	36,641.83	36,641.83	36,641.83	--	0.0	--	--
Grinding and Machining	4,505.14	4,505.14	4,505.14	--	0.0	--	--
Woodworking	83.79	83.79	83.79	--	0.0	--	--
Insignifcant Activity - Space Heater	0.00	0.02	0.02	0.00	0.012	0.21	0.18
Instapak 50W Foam Production	0.00	0.00	0.00	--	1.62E-06	--	--
Total Uncontrolled PTE from Source	**41,363.61**	**41,363.62**	**41,363.62**	**0.00**	**3,325.6**	**0.21**	**0.18**

SOURCEWIDE CONTROLLED and LIMITED PTE (tons/year)							
Unit Name	PM	PM10	PM2.5	SO2	VOC	NOx	CO
Adhesive Booths #1 -#5	3.91	3.91	3.91	--		--	--
Desk Line 1	1.83	1.83	1.83	--		--	--
Desk Line 2	1.08	1.08	1.08	--		--	--
Drawer Line	0.00	0.00	0.00	--		--	--
Chair Line 1	3.90	3.90	3.90	--		--	--
Chair Line 2	2.57	2.57	2.57	--		--	--
Wood Milling and Assembly	36.64	36.64	36.64	--		--	--
Grinding and Machining	4.51	4.51	4.51	--		--	--
Woodworking	0.08	0.08	0.08	--		--	--
Insignifcant Activity - Space Heater	0.00	0.02	0.02	0.00		0.21	0.18
Instapak 50W Foam Production	0.00	0.00	0.00	--	**PAL Limit**	--	--
Total Controlled and Limited PTE from Source	**54.52**	**54.53**	**54.53**	**0.00**	**348.58**	**0.21**	**0.18**

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

326 IAC 2-7-10.5 Applicability

Source Modification Uncontrolled PTE (tons/year)							
Unit Name	PM	PM10	PM2.5	SO2	VOC	NOx	CO
New Units							
Adhesive Booths #1 -#5	39.06	39.06	39.06	--	0.0	--	--
Modified Existing Units							
*Existing Units PTE Before Change	66.53	66.53	66.53	--	535.0	--	--
*Existing Units PTE After Change	93.79	93.79	93.79	--	1,743.2	--	--
Net Change from modified Units	27.26	27.26	27.26	--	1,208.2	--	--
Total PTE from Source Modification	**66.32**	**66.32**	**66.32**	**--**	**1,208.2**	**--**	**--**

* The existing units are limited under the VOC PAL.

326 IAC 2-2 Applicability

Source Modification - Actual to Potential - ATP (tons/year)							
Unit Name	PM	PM10	PM2.5	SO2	*VOC	NOx	CO
New Units							
Adhesive Booths #1 -#5	3.91	3.91	3.91	--		--	--
Modified Existing Units (Actual-to-Projected Actual-ATPA Test)							
Baseline Actual Emissions							
Modified Existing Units	2.23	2.23	2.23	--		--	--
Projected Future Actual Emissions							
Modified Existing Units	2.23	2.23	2.23	--		--	--
Emissions Increase - ATPA	0.00	0.00	0.00	--	PAL	--	--
Total PTE from Source Modification	**3.91**	**3.91**	**3.91**	**--**		**--**	**--**
PSD Significant Thresholds	25	15	10	40	40	40	100

*VOC Controlled Emissions from the Source Modification are combined into the Plantwide Applicability Limitations (PAL).

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

New Adhesive Booths #1 - #5

Unit Name	Coating Material	Capacity Units/Hr	Density Lbs/Gal	lb VOC / Gal Coating	Gal of Material (Gal/Unit)	Uncontrolled VOC lbs/hr	Uncontrolled VOC lbs/day	Uncontrolled VOC PTE (tons/yr)	Weight % Solid	Transfer Efficiency %	Uncontrolled PM/PM10/PM2.5 lbs/hr	Uncontrolled PM/PM10/PM2.5 lbs/day	Uncontrolled PM/PM10/PM2.5 PTE (tons/yr)	Control Efficieny %	Controlled PM/PM10/PM2.5 PTE (tons/yr)
Adhesive Booth #1	AD	1.000	8.846	0.000	0.56	0.00	0.00	0.00	48%	25%	1.78	42.80	7.81	90%	0.78
Adhesive Booth #2	AD	1.000	8.846	0.000	0.56	0.00	0.00	0.00	48%	25%	1.78	42.80	7.81	90%	0.78
Adhesive Booth #3	AD	1.000	8.846	0.000	0.56	0.00	0.00	0.00	48%	25%	1.78	42.80	7.81	90%	0.78
Adhesive Booth #4	AD	1.000	8.846	0.000	0.56	0.00	0.00	0.00	48%	25%	1.78	42.80	7.81	90%	0.78
Adhesive Booth #5	AD	1.000	8.846	0.000	0.56	0.00	0.00	0.00	48%	25%	1.78	42.80	7.81	90%	0.78
Totals:						0.00	0.00	0.00			8.92	214.00	39.06		3.91

Appendix A: Modified Units (Change in the method of operation) VOC PTE
Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Line Name	Old Unit Name	Old Coating Material	New Unit Name	New Coating Material	Capacity Units/Hr	Density Lbs/Gal	lb VOC / Gal Coating	Gal of Material (Gal/Unit)	Potential Production (hrs/yr)	Uncontrolled VOC PTE Before Modification (ton/yr)	Uncontrolled VOC PTE After Modification (tons/yr)	Net Change in PTE (tons/yr)
Desk Line #1	NGR #1 Booth F2	NGR	NGR #1 Booth F2	NGR	9.375	6.59	6.58	0.045	8760	12.16	12.16	0.00
	NGR #2 Booth G1	NGR	NGR #2 Booth G1	NGR	9.375	6.59	6.58	0.045	8760	12.16	12.16	0.00
	NGR #3 Booth F2A	NGR	NGR #3 Booth F2A	NGR	9.375	6.59	6.58	0.045	8760	12.16	12.16	0.00
	SAP #1 Booth F1	SAP	NGR #4 Booth F1	NGR	9.375	6.59	6.58	0.045	8760	9.19	12.16	2.97
	SAP #2 Booth F18	SAP	NGR #5 Booth F18	NGR	9.375	6.59	6.58	0.045	8760	9.19	12.16	2.97
	SAP #3 Booth F12	SAP	NGR #6 Booth F12	NGR	9.375	6.59	6.58	0.045	8760	9.19	12.16	2.97
	Washcoat Booth F3	WC	NGR #7 Booth F3	NGR	28.125	6.59	6.58	0.045	8760	45.57	36.48	-9.09
	Washcoat/SAP Stain Booth F47	WC	NGR #8 Booth F47	NGR	28.000	6.59	6.58	0.045	8760	45.37	36.31	-9.05
	Topcoat #1 Booth F6A	TC	Washcoat #1 Booth F6A	WC	28.125	6.92	6.49	0.057	8760	114.35	45.57	-68.78
	Topcoat #2 Booth F6B	TC	Sealer #1 Booth F6B	SEALER	28.125	7.59	6.26	0.068	8760	114.35	52.44	-61.91
	Topcoat #3 Booth F6	TC	First Topcoat #1 Booth F6	TC	28.125	7.84	5.73	0.162	8760	114.35	114.35	0.00
	Sealer Booth F5	SEALER	Final Topcoat #2 Booth F5	TC	28.125	7.84	5.73	0.162	8760	52.44	114.35	61.91
	Repair Booth F13	TC	Repair #1 Booth F13	TC	3.750	7.84	5.73	0.162	8760	15.25	15.25	0.00
	Wipestain Booth F4	WS	Repair #2 Booth F4	TC	28.125	7.84	5.73	0.162	8760	8.88	114.35	105.47
	NGR #1 Booth F16	NGR	Shade #1 Booth F16	NGR	28.000	6.59	6.58	0.045	8760	36.31	36.31	0.00
	NGR Booth F46	NGR	Wipestain #1 Booth F46	WS	28.000	7.84	6.55	0.011	8760	36.31	8.84	-27.48
	SAP Booth F15	SAP	Mix Booth F15	TC	28.000	7.84	5.73	0.162	8760	27.44	113.84	86.40
Desk Line #2	SAP Booth F45	SAP	NGR #9 Booth F45	NGR	28.000	6.59	6.58	0.045	8760	27.44	36.31	8.88
	Wipestain Booth F19	WS	NGR #10 Booth F19	NGR	28.000	6.59	6.58	0.045	8760	8.84	36.31	27.48
	Topcoat #1 and #3 Booth F23	TC	NGR #11 Booth F23	NGR	28.000	6.59	6.58	0.045	8760	113.84	36.31	-77.53
	Topcoat #2 Booth F22	TC	NGR #12 Booth F22	NGR	28.000	6.59	6.58	0.045	8760	128.94	36.31	-92.63
	Topcoat #2 and Sealer Booth F28	TC	NGR #13 Booth F28	NGR	28.000	6.59	6.58	0.045	8760	113.84	36.31	-77.53
	Washcoat Booth F17	WC	Washcoat #2 Booth F17	WC	28.000	6.92	6.49	0.057	8760	45.37	45.37	0.00
	Repair Booth F30	TC	Sealer #2 Booth F30	SEALER	1.250	7.59	6.26	0.068	8760	5.08	2.33	-2.75
	Repair Booth F10	TC	First Topcoat #2 Booth F10	TC	6.250	7.84	5.73	0.162	8760	25.41	25.41	0.00
	Wipestain Booth F27	WS	Final Topcoat #2 Booth F27	TC	28.000	7.84	5.73	0.162	8760	8.84	113.84	105.01
	Topcoat #1 and #3 Booth F29	TC	Repair #3 Booth F29	TC	28.000	7.84	5.73	0.162	8760	113.84	113.84	0.00
	Topcoat and Sealer Booth F25	TC	Repair #4 Booth F25	TC	6.250	7.84	5.73	0.162	8760	25.41	25.41	0.00
	Repair Booth F24	TC	Shade #2 Booth F24	NGR	6.250	6.59	6.58	0.045	8760	25.41	8.11	-17.33
	SAP/NGR #1 Booth F14	NGR	Wipestain #2 Booth F14	WS	6.250	7.84	6.55	0.011	8760	8.11	1.97	-6.13
	Wipestain Booth F11	WS	Wipestain Booth F11	WS	6 250	7.84	6.55	0.011	8760	1.97	1.97	0.00
	Topcoat Booth F8	TC	Topcoat Booth F8	TC	3.750	7.84	5.73	0.162	8760	15.25	15.25	0.00
Drawer Line	Drawer Coat Booth F7	NGR	Drawer Coat Booth F7	NGR	37.500	6.59	6.58	0.045	8760	48.63	48.63	0.00
Chair Line #1	SAP Booth C1	SAP	NGR #1 Booth C1	NGR	67.500	6.59	6.58	0.045	8760	66.14	87.54	21.40
	SAP/NGR #1 Booth C3	NGR	NGR #2 Booth C3	NGR	10.000	6.59	6.58	0.045	8760	12.97	12.97	0.00
	SAP/NGR #3 Booth C10	NGR	Sealer / First Topcoat #1 Booth C10	TC	10.000	7.84	5.73	0.162	8760	12.97	40.66	27.69
	Wipestain Booth C5	WS	Final Topcoat #1 Booth C5	TC	87.500	7.84	5.73	0.162	8760	27.61	355.76	328.14
	Sealer #1 Booth C8	SEALER	Repair #1 Booth C8	TC	87.500	7.84	5.73	0.162	8760	163.14	355.76	192.61
	Topcoat #1 and Sealer #2 Booth C7	TC	Repair #2 Booth C7	TC	87.500	7.84	5.73	0.162	8760	355.76	355.76	0.00
Chair Line #2	Repair Booth C9	TC	NGR #3 Booth C9	NGR	9.000	6.59	6.58	0.045	8760	36.59	11.67	-24.92
	Mix Booth C11	TC	Mix Booth C11	TC	1.000	7.84	5.73	0.162	8760	4.07	4.07	0.00
	NGR Booth C2	NGR	Final Topcoat #2 Booth C2	TC	67.500	7.84	5.73	0.162	8760	87.54	274.44	186.90
	Topcoat #2 Booth C6	TC	Repair #3 Booth C6	TC	87.500	7.84	5.73	0.162	8760	355.76	355.76	0.00
	Wipestain Booth U5	WS	NGR #4 Booth U5	NGR	25.000	6.59	6.58	0.045	8760	7.89	32.42	24.53
	SAP/NGR #1 Booth F20	NGR	Sealer / First Topcoat #3 Booth F20	TC	3.125	7.84	5.73	0.162	8760	4.05	12.71	8.65
	Washcoat Booth F21	WC	Final Topcoat #3 Booth F21	TC	6.250	7.84	5.73	0.162	8760	10.13	25.41	15.28
	Topcoat and Sealer Booth C12	TC	Repair #4 Booth C12	TC	6.250	7.84	5.73	0.162	8760	25.41	25.41	0.00
	Wipestain Booth F26	WS	Repair #5 Booth F26	TC	6.250	7.84	5.73	0.162	8760	1.97	25.41	23.44
	Repair Booth F44	TC	Sealer / First Topcoat #2 Booth F44	TC	1.250	7.84	5.73	0.162	8760	5.08	5.08	0.00
									Total VOC PTE:		3325.56	757.61

For 326 IAC 2-7-10.5 Permitting Applicability Level		
MODIFICATION - Operational Changes		
Total PTE Uncontrolled VOC Before Modification (tons/yr)	Total PTE Uncontrolled VOC After Modification (tons/yr)	VOC Emissions Change (tons/year)
534.98	1,743.17	1,208.18

Are units that are being modified through operational change VOC emissions are not controlled by a control equipment.

For PAL Purposes		
Line	Total Uncontrolled PTE per Line	Small, Significant, Major
Desk Line 1	761.04	Major
Desk Line 2	535.07	Major
Drawer Line	48.63	Significant
Chair Line 1	1208.44	Major
Chair Line 2	772.38	Major
Wood Milling and Assembly Operations	0.00	Small
Insignificant Activies	negl.	Small
Total PTE:	3325.56	

Old VOC PTE:	2950.83
Change in PTE due to operational changes:	757.61
Decommissioned Units VOC PTE:	382.88
Total VOC PTE:	3325.56

Appendix A: Modified Units (Change in the method of operation) PM PTE

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Line Name	Old Unit Name	Old Coating Material	New Unit Name	New Coating Material	Capacity Units/Hr	Density Lbs/Gal	Weight % Solid	Gal of Material (Gal/Unit)	Transfer Efficiency %	Potential Production (hours/Year)	Uncontrolled PM/PM10/PM2.5 PTE Before Modification (tons/yr)	Uncontrolled PM/PM10/PM2.5 PTE After Modification (tons/yr)	Net Change in Uncontrolled PM/PM10/PM2.5 PTE (tons/yr)	Control Efficiency %	Controlled PM/PM10/PM2.5 PTE Before Modification (tons/yr)	Controlled PM/Pm10/PM2.5 After PTE (tons/yr)	Net Change in Controlled PM/PM10/PM2.5 PTE (tons/yr)
Desk Line #1	NGR #1 Booth F2	NGR	NGR #1 Booth F2	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.00	0.00	0.00	90%	0.00	0.00	0.00
	NGR #2 Booth G1	NGR	NGR #2 Booth G1	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.00	0.00	0.00	90%	0.00	0.00	0.00
	NGR #3 Booth F2A	NGR	NGR #3 Booth F2A	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.00	0.00	0.00	90%	0.00	0.00	0.00
	SAP #1 Booth F1	SAP	NGR #4 Booth F1	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.00	0.00	0.00	90%	0.00	0.00	0.00
	SAP #2 Booth F18	SAP	NGR #5 Booth F18	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.00	0.00	0.00	90%	0.00	0.00	0.00
	SAP #3 Booth F12	SAP	NGR #6 Booth F12	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.00	0.00	0.00	90%	0.00	0.00	0.00
	Washcoat Booth F3	WC	NGR #7 Booth F3	NGR	28.125	6.59	0.15%	0.045	25%	8760	0.33	0.01	-0.32	90%	0.03	0.00	-0.03
	Washcoat/SAP Stain Booth F47	WC	NGR #8 Booth F47	NGR	28.000	6.59	0.15%	0.045	25%	8760	0.33	0.01	-0.32	90%	0.03	0.00	-0.03
	Topcoat #1 Booth F6A	TC	Washcoat #1 Booth F6A	WC	28.125	6.92	6.21%	0.057	25%	8760	4.03	0.33	-3.70	90%	0.40	0.03	-0.37
	Topcoat #2 Booth F6B	TC	Sealer #1 Booth F6B	SEALER	28.125	7.59	17.52%	0.068	25%	8760	4.03	1.10	-2.93	90%	0.40	0.11	-0.29
	Topcoat #3 Booth F6	TC	First Topcoat #1 Booth F6	TC	28.125	7.84	26.91%	0.162	25%	8760	4.03	4.03	0.00	90%	0.40	0.40	0.00
	Sealer Booth F5	SEALER	Final Topcoat #2 Booth F5	TC	28.125	7.84	26.91%	0.162	25%	8760	1.10	4.03	2.93	90%	0.11	0.40	0.29
	Repair Booth F13	TC	Repair #1 Booth F13	TC	3.750	7.84	26.91%	0.162	25%	8760	0.54	0.54	0.00	90%	0.05	0.05	0.00
	Wipestain Booth F4	WS	Repair #2 Booth F4	TC	28.125	7.84	26.91%	0.162	25%	8760	0.17	4.03	3.86	90%	0.02	0.40	0.39
	NGR #1 Booth F16	NGR	Shade #1 Booth F16	NGR	28.000	6.59	0.15%	0.045	25%	8760	0.01	0.01	0.00	90%	0.00	0.00	0.00
	NGR Booth F46	NGR	Wipestain #1 Booth F46	WS	28.000	7.84	16.45%	0.011	25%	8760	0.01	0.17	0.16	90%	0.00	0.02	0.02
	SAP Booth F15	SAP	Mix Booth F15	TC	28.000	7.84	26.91%	0.162	25%	8760	0.00	4.01	4.01	90%	0.00	0.40	0.40
Desk Line #2	SAP Booth F45	SAP	NGR #9 Booth F45	NGR	28.000	6.59	0.15%	0.045	25%	8760	0.00	0.01	0.00	90%	0.00	0.00	0.00
	Wipestain Booth F19	WS	NGR #10 Booth F19	NGR	28.000	6.59	0.15%	0.045	25%	8760	0.17	0.01	-0.16	90%	0.02	0.00	-0.02
	Topcoat #1 and #3 Booth F23	TC	NGR #11 Booth F23	NGR	28.000	6.59	0.15%	0.045	25%	8760	4.01	0.01	-4.00	90%	0.40	0.00	-0.40
	Topcoat #2 Booth F22	TC	NGR #12 Booth F22	NGR	28.000	6.59	0.15%	0.045	25%	8760	4.01	0.01	-4.00	90%	0.40	0.00	-0.40
	Topcoat #2 and Sealer Booth F28	TC	NGR #13 Booth F28	NGR	28.000	6.59	0.15%	0.045	25%	8760	4.01	0.01	-4.00	90%	0.40	0.00	-0.40
	Washcoat Booth F17	WC	Washcoat #2 Booth F17	WC	28.000	6.92	6.21%	0.057	25%	8760	0.33	0.33	0.00	90%	0.03	0.03	0.00
	Repair Booth F30	TC	Sealer #2 Booth F30	SEALER	1.250	7.59	17.52%	0.068	25%	8760	0.18	0.05	-0.13	90%	0.02	0.00	-0.01
	Repair Booth F10	TC	First Topcoat #2 Booth F10	TC	6.250	7.84	26.91%	0.162	25%	8760	0.90	0.90	0.00	90%	0.09	0.09	0.00
	Wipestain Booth F27	WS	Final Topcoat #2 Booth F27	TC	28.000	7.84	26.91%	0.162	25%	8760	0.17	4.01	3.84	90%	0.02	0.40	0.38
	Topcoat #1 and #3 Booth F29	TC	Repair #3 Booth F29	TC	28.000	7.84	26.91%	0.162	25%	8760	4.01	4.01	0.00	90%	0.40	0.40	0.00
	Topcoat and Sealer Booth F25	TC	Repair #4 Booth F25	TC	6.250	7.84	26.91%	0.162	25%	8760	0.90	0.90	0.00	90%	0.09	0.09	0.00
	Repair Booth F24	TC	Shade #2 Booth F24	NGR	6.250	6.59	0.15%	0.045	25%	8760	0.90	0.00	-0.89	90%	0.09	0.00	-0.09
	SAP/NGR #1 Booth F14	NGR	Wipestain #2 Booth F14	WS	6.250	7.84	16.45%	0.011	25%	8760	0.00	0.04	0.04	90%	0.00	0.00	0.00
	Wipestain Booth F11	WS	Wipestain Booth F11	WS	6.250	7.84	16.45%	0.011	25%	8760	0.04	0.04	0.00	90%	0.00	0.00	0.00
	Topcoat Booth F8	TC	Topcoat Booth F8	TC	3.750	7.84	26.91%	0.162	25%	8760	0.54	0.54	0.00	90%	0.05	0.05	0.00
Drawer Line	Drawer Coat Booth F7	NGR	Drawer Coat Booth F7	NGR	37.500	6.59	0.15%	0.045	25%	8760	0.01	0.01	0.00	90%	0.00	0.00	0.00
Chair Line #1	SAP Booth C1	SAP	NGR #1 Booth C1	NGR	67.500	6.59	0.15%	0.045	25%	8760	0.01	0.01	0.00	90%	0.00	0.00	0.00
	SAP/NGR #1 Booth C3	NGR	NGR #2 Booth C3	NGR	10.000	6.59	0.15%	0.045	25%	8760	0.00	0.00	0.00	90%	0.00	0.00	0.00
	SAP/NGR #3 Booth C10	NGR	Sealer / First Topcoat #1 Booth C10	TC	10.000	7.84	26.91%	0.162	25%	8760	0.00	1.43	1.43	90%	0.00	0.14	0.14
	Wipestain Booth C5	WS	Final Topcoat #1 Booth C5	TC	87.500	7.84	26.91%	0.162	25%	8760	0.52	12.53	12.01	90%	0.05	1.25	1.20
	Sealer #1 Booth C8	SEALER	Repair #1 Booth C8	TC	87.500	7.84	26.91%	0.162	25%	8760	3.43	12.53	9.11	90%	0.34	1.25	0.91
	Topcoat #1 and Sealer #2 Booth C7	TC	Repair #2 Booth C7	TC	87.500	7.84	26.91%	0.162	25%	8760	12.53	12.53	0.00	90%	1.25	1.25	0.00
Chair Line #2	Repair Booth C9	TC	NGR #3 Booth C9	NGR	9.000	6.59	0.15%	0.045	25%	8760	1.29	0.00	-1.29	90%	0.13	0.00	-0.13
	Mix Booth C11	TC	Mix Booth C11	TC	1.000	7.84	26.91%	0.162	25%	8760	0.14	0.14	0.00	90%	0.01	0.01	0.00
	NGR Booth C2	NGR	Final Topcoat #2 Booth C2	TC	67.500	7.84	26.91%	0.162	25%	8760	0.02	9.67	9.65	90%	0.00	0.97	0.97
	Topcoat #2 Booth C6	TC	Repair #3 Booth C6	TC	87.500	7.84	26.91%	0.162	25%	8760	12.53	12.53	0.00	90%	1.25	1.25	0.00
	Wipestain Booth U5	WS	NGR #4 Booth U5	NGR	25.000	6.59	0.15%	0.045	25%	8760	0.15	0.01	-0.14	90%	0.01	0.00	-0.01
	SAP/NGR #1 Booth F20	NGR	Sealer / First Topcoat #3 Booth F20	TC	3.125	7.84	26.91%	0.162	25%	8760	0.00	0.45	0.45	90%	0.00	0.04	0.04
	Washcoat Booth F21	WC	Final Topcoat #3 Booth F21	TC	6.250	7.84	26.91%	0.162	25%	8760	0.07	0.90	0.82	90%	0.01	0.09	0.08
	Topcoat and Sealer Booth C12	TC	Repair #4 Booth C12	TC	6.250	7.84	26.91%	0.162	25%	8760	0.90	0.90	0.00	90%	0.09	0.09	0.00
	Wipestain Booth F26	WS	Repair #5 Booth F26	TC	6.250	7.84	26.91%	0.162	25%	8760	0.04	0.90	0.86	90%	0.00	0.09	0.09
	Repair Booth F44	TC	Sealer / First Topcoat #2 Booth F44	TC	1.250	7.84	26.91%	0.162	25%	8760	0.18	0.18	0.00	90%	0.02	0.02	0.00
										Totals from Modified Lines	66.53	93.79	27.26		6.65	9.38	2.73

Modified units resulting in increase in PTE

Modified units resulting in no increase in PTE

For 326 IAC 2-7-10.5 Permitting Applicability Level

MODIFICATION - Operational Changes

Total PTE Uncontrolleed PM/PM10/PM2.5 Before Modification (tons/yr)	Total PTE Uncontrolleed PM/PM10/PM2.5 After Modification (tons/yr)	PM/PM10/PM2.5 Emissions Change (tons/year)
66.53	93.79	27.26

MODIFICATION - Operational Changes (ATPA)

Total Baseline Actual PM/PM10/PM2.5 for Modified Units (tons/yr)	Total PTE PM/PM10/PM2.5 After Modification (tons/yr)	PM/PM10/PM2.5 Emissions Change (tons/year)
2.23	9.38	7.15

Line	Total Uncontrolled PTE per Line After Modification (tons/yr)	*Total Controlled PTE per Line After Modification (tons/yr)
Desk Line 1	18.26	1.83
Desk Line 2	10.83	1.08
Drawer Line	0.01	0.00
Chair Line 1	39.04	3.90
Chair Line 2	25.66	2.57
Total Sourcewide PM PTE After Modification	**93.79**	**9.38**

*** Does not include reductions**

PLANTWIDE APPLICABILITY LIMITATIONS

Company Name: Pactiv, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Year	Month	Monthly VOC Usage (tons)	Previous 11 Months VOC Usage (tons)	12 Month Total VOC Usage (tons)	24 Month Total VOC Usage (tons)	VOC Emission Totals Reported on Quarterly Sheets																	
						pg # 74 quarterly F2A, F6A, F6B, and F13			pg # 75 quarterly F1 through F12, and F14 through F16			pg # 76 quarterly F17 through F26, F44 through F47, G1 and C1 through C12			pg # 77 quarterly F27, F28, F29, and F30			pg # 78 quarterly All booths of UV line			pg # 62 or 63 or 59 or 58 quarterly F17 through F26, F44 through F47, G1, and C1 through C12		
						Current Month	Previous 11 Months	12 Month Total	Current Month	Previous 11 Months	12 Month Total	Current Month	Previous 11 Months	12 Month Total	Current Month	Previous 11 Months	12 Month Total	Current Month	Previous 11 Months	12 Month Total	Current Month	Previous 11 Months	12 Month Total
2003	Jan	0.00	#REF!																				
	Feb	0.00	#REF!																				
	Mar	0.00	#REF!																				
	Apr	0.00	#REF!																				
	May	0.00	#REF!																				
	Jun	0.00	0.00																				
	Jul	0.00	0.00																				
	Aug	0.00	0.00																				
	Sep	0.00	0.00																				
	Oct	0.00	0.00																				
	Nov	0.00																					
	Dec	0.00	0.00	0.00																			
2004	Jan	29.90	0.00	29.90	29.90	3.90	41.80	45.70	11.90	129.40	141.30	13.10	136.60	149.70	0.00	0.00	0.00	1.00	10.70	11.70			
	Feb	26.50	29.90	56.40	56.40	3.40	42.10	45.50	10.50	130.30	140.80	11.70	139.00	150.70	0.00	0.00	0.00	0.90	10.80	11.70			
	Mar	30.40	56.40	86.80	86.80	3.80	41.90	45.70	11.70	129.00	140.70	13.90	138.90	152.80	0.00	0.00	0.00	1.00	10.80	11.80			
	Apr	26.80	86.80	113.60	113.60	3.50	42.10	45.60	10.80	129.40	140.20	11.60	139.90	151.50	0.00	0.00	0.00	0.90	10.90	11.80			
	May	26.70	113.60	140.30	140.30	3.50	41.50	45.00	10.60	127.70	138.30	11.70	138.70	150.40	0.00	0.00	0.00	0.90	10.80	11.70			
	Jun	30.63	140.30	170.93	170.93	4.10	41.60	45.70	12.60	128.00	140.60	12.87	140.30	153.20	0.00	0.00	0.00	1.06	10.80	11.90			
	Jul	0.00	170.93	170.93	170.93																		
	Aug	0.00	170.93	170.93	170.93																		
	Sep	0.00	170.93	170.93	170.93																		
	Oct	29.60	170.93	200.53	200.53	3.70	39.90	43.60	12.10	123.30	135.40	12.50	136.90	149.40	0.30	0.25	0.55	1.00	10.46	1.46			
	Nov	33.00	200.53	233.53		4.00	39.70	43.70	13.10	123.40	136.50	14.50	136.70	151.20	0.30	0.85	0.85	1.10	10.46	11.56			
	Dec	27.85	233.53	261.38		3.50	40.80	44.30	11.40	127.50	138.90	11.70	141.20	152.90	0.25	0.85	1.10	1.00	10.76	11.76			
2005	Jan	32.80	231.48	264.28	294.18	3.90	40.40	44.30	12.70	127.00	139.70	14.30	139.80	154.10	0.80	1.10	1.90	1.10	10.76	11.86			
	Feb	33.30	237.78	271.08	327.48	4.30	40.90	45.20	8.90	129.00	138.10	17.30	142.40	159.70	0.90	1.90	2.80	1.90	10.96	12.86			
	Mar	33.60	240.68	274.28	361.08	3.70	41.40	45.10	9.00	126.40	135.40	18.80	145.80	164.60	0.90	2.80	3.70	1.20	11.86	13.06			
	Apr	33.10	247.48	280.58	394.18	3.80	41.60	45.40	9.00	124.60	133.60	18.20	153.00	171.20	0.90	3.70	4.60	1.20	12.20	13.40			
	May	33.50	253.88	287.38	427.68	3.90	41.90	45.80	9.30	123.00	132.30	18.50	159.50	178.00	0.90	4.60	5.50	0.90	12.50	13.40			
	Jun	38.20	256.75	294.95	465.88	4.30	41.70	46.00	10.30	119.70	130.00	21.20	165.10	186.30	1.00	5.50	6.50	1.40	12.30	13.70			
	Jul	31.90	294.95	326.85	497.78	3.60	42.50	46.10	8.50	119.40	127.90	17.80	173.50	191.30	0.90	6.50	7.40	1.10	12.80	13.90			
	Aug	39.30	326.85	366.15	537.08	4.40	42.50	46.90	10.70	115.80	126.50	21.70	177.70	199.40	1.10	7.40	8.50	1.40	12.90	14.30			
	Sep	24.39	366.15	390.54	561.47	1.50	43.10	44.60	7.20	115.00	122.20	13.70	186.50	200.20	0.89	8.25	9.14	1.10	13.30	14.40			
	Oct	25.70	360.94	386.64	587.17	1.60	40.90	42.50	7.80	110.10	117.90	14.20	187.70	201.90	0.90	8.84	9.74	1.20	13.39	14.59			
	Nov	29.30	353.64	382.94	616.47	1.90	38.50	40.40	8.70	104.80	113.50	16.30	187.40	203.70	1.10	9.44	10.54	1.30	13.49	14.79			
	Dec	24.50	355.09	379.59	640.97	1.50	36.90	38.40	7.20	102.10	109.30	13.80	192.00	205.80	0.90	10.29	11.19	1.10	13.79	14.89			
2006	**Jan**	26.50	346.79	373.29	637.57	1.70	34.50	36.20	8.10	96.60	104.70	14.50	191.50	206.00	1.00	10.39	11.39	1.20	13.79	14.99			
	Feb	25.80	339.99	365.79	636.87	1.70	31.90	33.60	7.70	95.50	103.50	14.40	188.70	203.10	0.90	10.49	11.39	1.10	13.09	14.19			
	Mar	24.60	332.19	356.79	631.07	1.90	29.90	31.80	8.60	94.50	103.10	11.80	184.30	196.10	1.00	10.49	11.49	1.30	12.99	14.29			
	Apr	24.50	323.69	348.19	628.77	1.60	28.00	29.60	7.30	94.10	101.40	13.60	177.90	191.50	0.90	10.59	11.49	1.10	13.09	14.19			
	May	27.70	314.69	342.39	629.77	1.80	25.70	27.50	8.30	92.10	100.40	15.40	173.00	188.40	1.00	10.59	11.59	1.20	13.29	14.49			
	Jun	26.80	304.19	330.99	625.94	1.70	23.20	24.90	7.90	90.10	98.00	15.00	167.20	182.20	1.00	10.59	11.59	1.20	13.09	14.29			
	Jul	24.47	299.09	323.56	650.41																24.47	299.08	323.55
	Aug	26.90	284.26	311.16	677.31																26.90	284.25	311.15
	Sep	24.60	286.77	311.37	701.91	<< Added Units N1 - N31															24.60	286.77	311.37
	Sub-total	**311.37**																					
	Oct	30.20	285.67	315.87	1013.88																30.20	285.67	315.87
	Nov	32.50	597.94	630.44	1013.38																32.50	286.57	319.07
	Dec	19.50	605.94	625.44	1005.03																19.50	294.57	315.07
2007	**Jan**	13.80	598.04	612.74	986.03																13.80	156.80	170.60
	Feb	9.10	586.94	596.04	961.83																9.10	156.20	165.30
	Mar	14.30	571.44	585.74	942.53																14.30	153.50	167.80
	Apr	11.20	561.24	572.44	920.63																11.20	153.50	164.70
	May	8.70	544.74	553.44	895.83																8.70	156.60	165.30
	Jun	13.80	526.64	540.44	871.43																13.80	154.20	168.00
	Jul	12.90	515.97	528.87	852.43																12.90	157.90	170.80
	Aug	9.30	501.97	511.27	822.43																9.30	154.70	164.00
	Sep	14.10	175.30	189.40	**812.14**																14.10	152.10	156.20
	Sub-total	**189.40**			**500.77**	250.39 average for October 2005 -September 2007																	
	Oct	0.79	159.20	159.99	976.63																0.79	9.93	10.72
	Nov	0.66	316.89	317.55	947.99																0.66	10.15	11.47
	Dec	0.94	298.05	298.99	924.43																0.94	9.58	10.52
2008	Jan	13.88	285.19	299.07	911.81																13.88	110.05	123.93
	Feb	10.95	289.97	300.92	896.96																10.95	123.01	133.96
	Mar	15.04	286.62	301.66	887.40																15.04	108.60	123.64
	Apr	13.85	290.46	304.31	876.75	<< Removed Units N1 - N31															13.85	108.43	122.28
	May	10.04	295.61	305.65	859.09																10.04	112.25	122.29
	Jun	15.31	291.85	307.16	847.60																15.31	107.01	122.32
	Jul	14.07	294.26	308.33	837.20																14.07	124.70	138.77
	Aug	10.51	299.03	309.54	820.81																10.51	128.80	139.34
	Sep	15.74	306.04	321.78	500.58																15.74	124.30	140.00
	Oct	11.10	120.99	132.09	481.48																11.10	121.38	132.48
	Nov	12.20	131.43	143.63	461.18																12.20	125.88	138.08
	Dec	11.70	142.69	154.39	453.38																11.70	128.68	140.38
2009	Jan	9.08	140.51	149.59	448.66																9.08	129.50	139.30
	Feb	8.70	138.64	147.34	448.26																8.70	128.40	137.10
	Mar	8.60	132.30	140.90	442.56																8.60	127.70	136.30
	Apr	7.20	127.05	134.25	438.56																7.20	123.40	130.60
	May	7.70	124.21	131.91	437.56																7.70	121.30	129.00
	Jun	7.30	116.60	123.90	431.06																7.30	114.60	121.90
	Jul	8.10	109.83	117.93	426.26																8.10	108.80	116.90
	Aug	8.30	107.42	115.72	425.26																8.30	107.20	115.50
	Sep	8.70	99.98	108.68	230.48																8.70	100.70	109.40
	Oct	9.80	97.58	107.38	219.42																9.80	98.30	108.90
	Nov	10.93	95.18	106.11	249.74																10.93	95.89	106.82
	Dec	11.17	94.41	105.58	259.97																11.17	95.12	106.29
2010	Jan	10.11	96.50	106.61	256.20																10.11	96.49	106.60
	Feb	10.03	97.91	107.94	255.28																10.03	97.90	107.93
	Mar	10.14	99.34	109.48	250.38																10.14	99.33	109.47
	Apr	10.09	102.28	112.37	246.62																10.09	102.27	112.36
	May	10.33	104.67	115.00	246.70																10.33	104.66	114.99
	Jun	11.11	107.70	118.81	242.73																11.11	107.69	118.80
	Jul	11.19	110.71	121.90	239.83																11.19	110.70	121.89
	Aug	10.78	113.60	124.38	240.10																10.78	113.59	124.37
	Sep	11.08	115.68	126.76	235.44																11.08	115.67	126.75
	Oct	11.41	116.96	128.37	235.75																11.41	116.96	128.37
	Nov	11.54	117.44	128.98	235.09																11.54	117.44	128.98
	Dec	10.93	117.81	128.74	234.32																10.93	117.81	128.74
2011	Jan	13.88	118.63	132.51	239.12																13.88	118.63	132.51
	Feb	15.49	122.48	137.97	245.91																15.49	122.48	137.97
	Mar	16.37	127.83	144.20	253.68																16.37	127.83	144.20
	Apr	18.51	134.11	152.62	264.99																18.51	134.11	152.62
	May	18.68	142.29	160.97	275.97																18.68	142.29	160.97
	Jun	17.23	149.86	167.09	285.90																17.23	149.86	167.09
	Jul	17.64	155.90	173.54	295.44																17.64	155.90	173.54
	Aug	18.37	162.76	181.13	305.51																18.37	162.76	181.13
	Sep	18.28	170.05	188.33	315.05																18.28	170.05	188.33
	Oct	17.87	176.92	194.79	323.16																17.87	176.92	194.79
	Nov	18.01	183.25	201.26	330.24																18.01	183.25	201.26
	Dec	16.87	190.33	207.20	335.94																16.87	190.33	207.20
2012	Jan	11.77	193.32	205.09	337.60																11.77	193.32	205.09
	Feb	14.46	189.60	204.06	342.01																14.46	189.60	204.06
	Mar	15.41	187.69	203.10	347.30																15.41	187.69	203.10
	Apr	17.17	184.59	201.76	354.38																17.17	184.59	201.76
	May	16.83	183.08	199.91	360.88																16.83	183.08	199.91
	Jun	17.81	182.68	200.49	367.58																17.81	182.68	200.49
	Jul	18.30	182.85	201.15	374.69																18.30	182.85	201.15
	Aug	18.70	182.78	201.48	382.61																18.70	182.78	201.48
	Sep	20.00	183.20	203.20	391.53																20.00	183.20	203.20
	Oct	19.20	185.33	204.53	399.32																19.20	185.33	204.53
	Nov	19.50	186.52	206.02	407.78																19.50	186.52	206.02
	Dec	19.00	189.15	208.15	415.35																19.00	189.15	208.15
2013	Jan	14.40	196.38	210.78	415.87																14.40	189.15	203.55
	Feb	15.36	196.32	211.68	415.74																15.36	210.78	226.14
	Mar	15.01	196.27	211.28	414.38																15.01	211.68	226.69
	Apr	21.63	194.11	215.74	417.50																21.63	211.28	232.91
	May	21.96	198.91	220.87	420.78																21.96	215.74	237.70
	Jun	22.38	203.06	225.44	425.93																22.38	220.87	243.25
	Jul	18.71	207.14	225.85	427.00																18.71	207.14	225.85
	Aug	18.94	207.15	226.09	427.37																18.94	207.15	226.09
	Sep	18.81	206.09	224.90	428.10																18.81	206.09	224.90
	Oct	17.87	205.70	223.57	428.10																17.87	205.70	223.57
	Nov	18.01	204.07	222.08	428.10																18.01	204.07	222.08
	Dec	14.31	203.08	217.39	425.54																14.31	203.08	217.39
2014	Jan	18.00	202.99	220.99	431.72																18.00	202.99	217.39
	Feb	18.50	205.63	224.13	435.81																18.50	205.63	224.13
	Mar	18.87	209.12	227.99	439.27																18.87	209.12	227.99
	Apr	24.64	206.36	231.00	446.74																24.64	206.36	231.00
	May	23.64	209.04	232.68	453.55																23.64	209.04	232.50
	Jun	23.86	210.30	234.16	459.60																23.86	210.12	233.98
	Jul	22.85	215.45	238.30	464.15																22.85	215.27	238.12
	Aug	23.24	219.36	242.60	468.69																23.24	219.18	242.42
	Sep	23.14	223.79	246.93	471.83																23.14	223.61	246.75
	Oct	19.81	229.06	248.87	472.44																19.81	228.88	248.69
	Nov	19.43	230.86	250.29	472.37																19.43	230.68	250.11
	Dec	18.88	235.98	254.86	472.25																18.88	235.80	254.68
2015	Jan	14.86	236.86	251.72	472.71																14.86	236.68	251.54
	Feb	16.54	233.22	249.76	473.89																16.54	233.04	249.58
	Mar	17.11	230.89	248.00	475.99																17.11	230.71	247.82
	Apr	16.29	223.36	239.65	470.65																16.29	223.18	239.47
	May	16.77	216.01	232.78	465.46																16.77	216.01	232.78
	Jun	16.38	208.92	225.30	459.46																16.38	208.92	225.30
	Jul	25.02	202.45	227.47	465.77																		
	Aug	25.50	204.23	229.73	472.31																		
	Sep	24.74	206.59	231.33	478.26																		
	Oct	0.00	152.09	152.09																			
	Nov	0.00	152.09	152.09																			
	Dec	0.00	171.21	171.21																			

Key:
= unknown
= not needed
= 10 year period
= highest 24 month period

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Line	Unit	Coating Material	Capacity Units/Hr	Density Lbs/Gal	lb VOC / Gal Coating	Gal of Material (Gal/Unit)	Potential Production	PTE	Percent of PTE	Actual Emissions based on Percent of PTE
Desk Line #1	NGR #1 Booth F2	NGR	9.375	6.59	6.58	0.045	8760	12.16	0.37%	1.83
	NGR #2 Booth G1	NGR	9.375	6.59	6.58	0.045	8760	12.16	0.37%	1.83
	NGR #3 Booth F2A	NGR	9.375	6.59	6.58	0.045	8760	12.16	0.37%	1.83
	NGR #4 Booth F1	NGR	9.375	6.59	6.58	0.045	8760	12.16	0.37%	1.83
	NGR #5 Booth F18	NGR	9.375	6.59	6.58	0.045	8760	12.16	0.37%	1.83
	NGR #6 Booth F12	NGR	9.375	6.59	6.58	0.045	8760	12.16	0.37%	1.83
	NGR #7 Booth F3	NGR	28.125	6.59	6.58	0.045	8760	36.48	1.10%	5.49
	NGR #8 Booth F47	NGR	28.000	6.59	6.58	0.045	8760	36.31	1.09%	5.47
	Washcoat #1 Booth F6A	WC	28.125	6.92	6.49	0.057	8760	45.57	1.37%	6.86
	Sealer #1 Booth F6B	SEALER	28.125	7.59	6.26	0.068	8760	52.44	1.58%	7.90
	First Topcoat #1 Booth F6	TC	28.125	7.84	5.73	0.162	8760	114.35	3.44%	17.22
	Final Topcoat #2 Booth F5	TC	28.125	7.84	5.73	0.162	8760	114.35	3.44%	17.22
	Repair #1 Booth F13	TC	3.750	7.84	5.73	0.162	8760	15.25	0.46%	2.30
	Repair #2 Booth F4	TC	28.125	7.84	5.73	0.162	8760	114.35	3.44%	17.22
	Shade #1 Booth F16	NGR	28.000	6.59	6.58	0.045	8760	36.31	1.09%	5.47
	Wipestain #1 Booth F46	WS	28.000	7.84	6.55	0.011	8760	8.84	0.27%	1.33
	Mix Booth F15	TC	28.000	7.84	5.73	0.162	8760	113.84	3.42%	17.14
Desk Line #2	NGR #9 Booth F45	NGR	28.000	6.59	6.58	0.045	8760	36.31	1.09%	5.47
	NGR #10 Booth F19	NGR	28.000	6.59	6.58	0.045	8760	36.31	1.09%	5.47
	NGR #11 Booth F23	NGR	28.000	6.59	6.58	0.045	8760	36.31	1.09%	5.47
	NGR #12 Booth F22	NGR	28.000	6.59	6.58	0.045	8760	36.31	1.09%	5.47
	NGR #13 Booth F28	NGR	28.000	6.59	6.58	0.045	8760	36.31	1.09%	5.47
	Washcoat #2 Booth F17	WC	28.000	6.92	6.49	0.057	8760	45.37	1.36%	6.83
	Sealer #2 Booth F30	SEALER	1.250	7.59	6.26	0.068	8760	2.33	0.07%	0.35
	First Topcoat #2 Booth F10	TC	6.250	7.84	5.73	0.162	8760	25.41	0.76%	3.83
	Final Topcoat #2 Booth F27	TC	28.000	7.84	5.73	0.162	8760	113.84	3.42%	17.14
	Repair #3 Booth F29	TC	28.000	7.84	5.73	0.162	8760	113.84	3.42%	17.14
	Repair #4 Booth F25	TC	6.250	7.84	5.73	0.162	8760	25.41	0.76%	3.83
	Shade #2 Booth F24	NGR	6.250	6.59	6.58	0.045	8760	8.11	0.24%	1.22
	Wipestain #2 Booth F14	WS	6.250	7.84	6.55	0.011	8760	1.97	0.06%	0.30
	Wipestain Booth F11	WS	6.250	7.84	6.55	0.011	8760	1.97	0.06%	0.30
	Topcoat Booth F8	TC	3.750	7.84	5.73	0.162	8760	15.25	0.46%	2.30
Drawer Line	Drawer Coat Booth F7	NGR	37.500	6.59	6.58	0.045	8760	48.63	1.46%	7.32
Chair Line #1	NGR #1 Booth C1	NGR	67.500	6.59	6.58	0.045	8760	87.54	2.63%	13.18
	NGR #2 Booth C3	NGR	10.000	6.59	6.58	0.045	8760	12.97	0.39%	1.95
	Sealer / First Topcoat #1 Booth C10	TC	10.000	7.84	5.73	0.162	8760	40.66	1.22%	6.12
	Final Topcoat #1 Booth C5	TC	87.500	7.84	5.73	0.162	8760	355.76	10.70%	53.57
	Repair #1 Booth C8	TC	87.500	7.84	5.73	0.162	8760	355.76	10.70%	53.57
	Repair #2 Booth C7	TC	87.500	7.84	5.73	0.162	8760	355.76	10.70%	53.57
Chair Line #2	NGR #3 Booth C9	NGR	9.000	6.59	6.58	0.045	8760	11.67	0.35%	1.76
	Mix Booth C11	TC	1.000	7.84	5.73	0.162	8760	4.07	0.12%	0.61
	Final Topcoat #2 Booth C2	TC	67.500	7.84	5.73	0.162	8760	274.44	8.25%	41.33
	Repair #3 Booth C6	TC	87.500	7.84	5.73	0.162	8760	355.76	10.70%	53.57
	NGR #4 Booth U5	NGR	25.000	6.59	6.58	0.045	8760	32.42	0.97%	4.88
	Sealer / First Topcoat #3 Booth F20	TC	3.125	7.84	5.73	0.162	8760	12.71	0.38%	1.91
	Final Topcoat #3 Booth F21	TC	6.250	7.84	5.73	0.162	8760	25.41	0.76%	3.83
	Repair #4 Booth C12	TC	6.250	7.84	5.73	0.162	8760	25.41	0.76%	3.83
	Repair #5 Booth F26	TC	6.250	7.84	5.73	0.162	8760	25.41	0.76%	3.83
	Sealer / First Topcoat #2 Booth F44	TC	1.250	7.84	5.73	0.162	8760	5.08	0.15%	0.77
Woodmilling & and Assembly Operations	Wood Milling Process DC4/6		6622.650				8760	0.00	0.00%	0.00
	Furniture Assembly Process DC4/6		6622.650				8760	0.00	0.00%	0.00
Insignificant Activities	Woodworking facilities DC7, DC11, and DC12						8760	negl.	0.00%	0.00
	Grinding and machining operations						8760	negl.	0.00%	0.00
	Natural gas-fired space heater						8760	negl.	0.00%	
	Paved and unpaved roads						8760	negl.	0.00%	0.00
	Replacement or repair of electrostatic precipitators						8760	negl.	0.00%	0.00
	Other activities with PM equal to or less than 5 lb/hr or 25 lb/day: woodworking operations and sawdust storage						8760	negl.	0.00%	0.00
	Activities with VOC emissions equal to or less than 3 lb/hr or 15 lb/day: 2 dip tanks and 1 test booth						8760	negl.	0.00%	0.00
							Total VOC PTE:	3325.56		500.77

Line	Baseline Actual Emissions per Line (tons/yr)
Desk Line 1	114.60
Desk Line 2	80.57
Desk Line 3	0.00
Desk Line 4	0.00
Desk Line 5	0.00
Desk Line 6	0.00
Drawer Line	7.32
Chair Line	181.97
Chair Line 2	116.31
UV Line	0.00
Chair Line 4	0.00
Wood Milling and Assembly Operations	0.00
Insignificant Acitivies	negl.
Total Baseline Actual Emissions (tons/yr):	500.77

Appendix A: Part B of PAL-01 (Pg #2)

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Emission Unit	PTE	PTE Designation (Small, Significant, Major)	Average Past Actual Emissions (Baseline)	Basis for Actual Emissions (e.g., Mass Balance, CEMS, etc.)	Applicable Requirements
Wood Milling and Assembly Operations	0.00	Small	0.00	Mass balance information from supplier and proportional distribution based on production rates	326 IAC 2-2-3, 326 IAC 6-3-2, 40 CFR Part 64
Insignificant Acitivies	negl.	Small	negl.	Mass balance information from supplier and proportional distribution based on production rates	326 IAC 6-3-2, 326 IAC 2-2 avoidance
Drawer Line	48.63	Significant	7.32	Mass balance information from supplier and proportional distribution based on production rates	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Desk Line 1	761.04	Major	114.60	Mass balance information from supplier and proportional distribution based on production rates	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Desk Line 2	535.07	Major	80.57	Mass balance information from supplier and proportional distribution based on production rates	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Chair Line	1208.44	Major	181.97	Mass balance information from supplier and proportional distribution based on production rates	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Chair Line 2	772.38	Major	116.31	Mass balance information from supplier and proportional distribution based on production rates	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Total:	3325.56		500.77		
Significance Level			40.00		
*Calculated PAL:			273.20		

*See Page 12 of 20 of this App A for the new allowable PAL.
Current PAL (Condition E.1.1) = 419.5 tons/year

Appendix A: Part B of PAL-03 (Pg #2)

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Emission Unit	PTE	PTE Designation (Small, Significant, Major)	Average Past Actual Emissions (Baseline)	PAL Monitoring System (e.g., Mass Balance, CEMS, etc.)	Applicable Requirements
Small Units					
Wood Milling and Assembly Operations	0.00	Small	0.00	CEMS	326 IAC 2-2-3, 326 IAC 6-3-2, 40 CFR Part 64
Insignificant Acitivies	negl.	Small	negl.	CEMS	326 IAC 6-3-2, 326 IAC 2-2 avoidance
Subtotal:	0.00		0.00		
Significant/Major Units					
Drawer Line	48.63	Significant	7.32	CEMS	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Desk Line 1	761.04	Major	114.60	CEMS	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Desk Line 2	535.07	Major	80.57	CEMS	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Chair Line	1,208.44	Major	181.97	CEMS	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Chair Line 2	772.38	Major	116.31	CEMS	326 IAC 2-2-3, 326 IAC 2-2.4, 326 IAC 8-2-12, 326 IAC 6-3-2, 40 CFR Part 63, Subpart JJ
Subtotal:	3,276.92		500.77		

Appendix A: Part B of PAL-03 (Pg #3)

Company Name: Paoli, Inc.

Source Address: 201 E. Martin St., Orleans, IN 47452

SSM No.: 117-36652-00014

SPM No.: 117-36444-00014

Reviewer: Aida DeGuzman

Emission Unit	PTE	PTE Designation (Small, Significant, Major)	Average Past Actual Emissions (Baseline)	PAL Monitoring System (e.g., Mass Balance, CEMS, etc.)	Applicable Requirements
New/ Modified Units (Increases)					
Adhesive Booth #1	0.00	Small	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326
Adhesive Booth #2	0.00	Small	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ,
Adhesive Booth #3	0.00	Small	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Adhesive Booth #4	0.00	Small	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Adhesive Booth #5	0.00	Small	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Subtotal:	0.00		0.00		
Removed Units (Decreases)					
Drawer Enamel Booth F9	48.63	Significant	3.56	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Robotic Spray Booth U1	32.42	Small	3.09	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Stain and Washcoat Booth U2	40.51	Significant	4.67	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Sealer Booth U4	46.61	Significant	5.88	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Washcoat Both C4	141.78	Major	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
NGR Booth U3	32.42	Small	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Washcoat Booth U6	40.51	Significant	0.00	CEMS	326 IAC 2-2-3, 326 IAC 8-2-12, 326 IAC 6-3-2, 326 IAC 2-7-5(13), 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a), 326 IAC 2-7-5(3), 326 IAC 2-7-19, 326 IAC 20-1, 326 IAC 2-2.4, 40 CFR 63, Subpart A, 40 CFR Part 63, Subpart JJ, 326 IAC 20-14-1
Subtotal:	382.88		17.20		
Total Baseline:			233.19		
Significance Level:			40.00		
PAL:			273.19		

Appendix A: Part B of PAL-03 (Pg #3)

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

													Calcuations based on production units from 2006 and 2007			
Line	Unit	Coating Material	Capacity Units/Hr	Density Lbs/Gal	lb VOC / Gal Coating	Transfer Efficiency (%)	Weight (%) Solids	Gal of Material (Gal/Unit)	Potential Production (Hrs)	Uncontrolled PM/PM10/PM2.5 PTE (tons/yr)	Uncontrolled VOC PTE (tons/yr)	Small, Significant, Major	Actual VOC Emissions from 2005 based on proposed hours	Actual Emissions from 2006 based on actual production units	Actual Emissions from 2007 based on actual production units	Total Actuals from Baseline
Drawer Line	Drawer Enamel Booth F9	NGR	37.500	6.59	6.58	25%	0.15%	0.045	8760	0.008	48.63	Significant	3.55	0.00	0.00	3.55
UV Line	Robotic Spray Booth U1	NGR	25.000	6.59	6.58	25%	0.15%	0.045	8760	0.006	32.42	Small	2.37	0.71	0.00	3.08
UV Line	Stain and Washcoat Booth U2	WC	25.000	6.92	6.49	25%	6.21%	0.057	8760	0.291	40.51	Significant	3.16	0.89	0.63	4.67
UV Line	Sealer Booth U4	SEALER	25.000	7.59	6.26	25%	17.52%	0.068	8760	0.978	46.61	Significant	4.13	1.03	0.72	5.88
Chair Line 3	Washcoat Both C4	WC	87.500	6.92	6.49	25%	6.21%	0.057	8760	1.017	141.78	Major	0.00	0.00	0.00	0.00
Chair Line 3	NGR Booth U3	NGR	25.000	6.59	6.58	25%	0.15%	0.045	8760	0.006	32.42	Small	0.00	0.00	0.00	0.00
Chair Line 3	Washcoat Booth U6	WC	25.000	6.59	6.49	25%	6.21%	0.057	8760	0.291	40.51	Significant	0.00	0.00	0.00	0.00
										2.60	382.88		13.21	2.63	1.35	17.19

2005	
Number of Hrs / 1 shift	8
Days production/ Week	5
Weeks left in 2005 baseline	16
Proposed Production Hours from 2005	640

2006

Total Desk Capacity Units/Hr	Total Units Produced in 2006	Total PTE	Total Emissions from 2006
761.625	146992.000	2950.83	625.44

UV Line Actuals from 2006

	U1	U2	U4	Total UV Line
Unit Capacity / Total Desk Capacity	0.0328	0.0328	0.0328	0.0985
Unit PTE / Total Desk PTE	0.0110	0.0137	0.0158	0.0405
Unit Throughput	4824.95	4824.95	4824.95	14474.84

2007

Total Desk Capacity Units/Hr	Total Units Produced in Jan 07 to Aug 07	Total Desk PTE	Total Emissions from 2007	Total Emisions from Jan 07 to Aug 07
761.625	103268.875	2950.83	109.59	93.1

UV Line Actuals from 2007

	U1	U2	U4	Total UV Line
Unit Capacity / Total Desk Capacity	0.0328	0.0328	0.0328	0.0985
Unit PTE / Total Desk PTE	0.0110	0.0137	0.0158	0.0405
Unit Throughput	3389.754633	3389.754633	3389.754633	10169.2639

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Submitting in October 2015 so use October 2005 to September 2015 for the 10 year Look Back	
2-Year Baseline Selected from October 2005 to September 2007	500.77
Average Baseline Actual Emissions	250.39
Subtract actual emissions from shutdown units	17.19
* Add PTE for new units (adhesive #1 - #5)	0.00
Add Significance VOC level	40.00
New Calculated PAL	**273.20**
New Requested PAL	**348.58**
Current PAL (as Reflected in E.1.1)	419.50

*The adhesive materials being used do not contain VOCs.

Pursuant to 326 IAC 2-2.4-10(d)(1) , if the emissions level calculated in accordance with 326 IAC 2-2.4-6 (i.e., 273.20 tons/year) is equal to or greater than 80% of the current PAL level, IDEM may renew the new PAL at the same level of 419.5 tons/year. The new calculated PAL of 273.2 tons/year is only 70.8% < 80%. Therefore, the new PAL cannot be adjusted to the same level of 419.50 tons/year, pursuant to this rule.

Justification for New Requested PAL of 348.58 tons/year

Pursuant to 326 IAC 2-2.4-10(d)(2), the department can set the PAL at a level that it determines to be appropriate considering:
(1) air quality needs,
(2) advance in control technology
(3) anticipated economic growth in the area
(4) desire to reward or encourage the source's voluntary reductions; or
(5) other factors as specifically identified by the department.

As mentioned, the new calculated PAL of 273.20 tons/year was based on the highest 24-month period of October 2005 to September 2007, Paoli has its highest production levels in the past between 2004 and 2006, with its highest twelve-month rolling emissions total reaching 390.54 tons/year in September 2005 and 386.64 tons/year in October 2005 (see page 6 of 20 of this TSD App A). With the downturn in the economy beginning in the first quarter 2007, Paoli began to realize these effects as the product it produces is considered a luxury item. From an economic standpoint luxury items are the ones with sales demands that are directly proportional to the health of the US economy. Since nine (9) months of 2007, lowered production due to economic downturn is factored in the 2-year actual used in the new calculated PAL of 273.20 tons/year, which was based on lowered actual VOC emissions.

Based on ten (10) years projection, Paoli 's production will increase steadily as the economy and demand of Paoli's products picks up.
Over the past four (4) years, with greater growth occurring in the non-VOC product line market, i.e., 28% growth from 2014 to 2015 was seen.
Regardless of growth in the non-VOC product line market, growth in VOC emitting product line is expected to remain steady due to the economies of luxury items that Paoli produces.

Expected Annual Emissions for 10-year Period for Products Emitting VOC (2015-2015)		
Year	**Expected Growth (%) of Highest Emitting VOC Product Over 2016**	**Expected VOC Emissions (tons/yr)**
2015	--	248.21
2016	--	270
2017	1.5	274.05
2018	3.05	278.24
2019	4.37	281.80
2020	6.00	286.20
2021	7.4	289.98
2022	9.12	294.62
2023	10.6	298.62
2024	12.42	303.53
2025	14.29	308.58
Significant Level		40
Requested PAL Limit		**348.58**

Note: The ten (10) year production outlook is claimed confidential.

Based on the 10- year term of the PAL, year 2025, VOC is expected to be emitted at 308.59 tons per year plus 40 tons/yr significant level, the new PAL Limit is 348.58 tons/year.

.

Material	Density	Lb VOC / Gal	Gal / Unit	Transfer Efficieny	Weight % Solids	Water lb/gal
SAP	6.59	6.58	0.034	25%	0.15%	0
NGR	6.59	6.58	0.045	25%	0.15%	0
WIPESTAIN	7.84	6.55	0.011	25%	16.45%	0
SEALER	7.59	6.26	0.068	25%	17.52%	0
WASHCOAT	6.92	6.49	0.057	25%	6.21%	0
TOPCOAT	7.84	5.73	0.162	25%	26.91%	0
ADHESIVES	8.846	0.00	0.56	25%	48.00%	4.59992

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Line	Unit	Coating Material	Capacity Units/Hr	Density Lbs/Gal	lb VOC / Gal Coating	Gal of Material (Gal/Unit)	Potential Production	VOC PTE	Small, Significant, Major
Desk Line #1	NGR #1 Booth F2	NGR	9.375	6.59	6.58	0.045	8760	12.16	Small
	NGR #2 Booth G1	NGR	9.375	6.59	6.58	0.045	8760	12.16	Small
	NGR #3 Booth F2A	NGR	9.375	6.59	6.58	0.045	8760	12.16	Small
	SAP #1 Booth F1	SAP	9.375	6.59	6.58	0.034	8760	9.19	Small
	SAP #2 Booth F18	SAP	9.375	6.59	6.58	0.034	8760	9.19	Small
	SAP #3 Booth F12	SAP	9.375	6.59	6.58	0.034	8760	9.19	Small
	Washcoat Booth F3	WC	28.125	6.92	6.49	0.057	8760	45.57	Significant
	Washcoat/SAP Stain Booth F47	WC	28.000	6.92	6.49	0.057	8760	45.37	Significant
	Topcoat #1 Booth F6A	TC	28.125	7.84	5.73	0.162	8760	114.35	Major
	Topcoat #2 Booth F6B	TC	28.125	7.84	5.73	0.162	8760	114.35	Major
	Topcoat #3 Booth F6	TC	28.125	7.84	5.73	0.162	8760	114.35	Major
	Sealer Booth F5	SEALER	28.125	7.59	6.26	0.068	8760	52.44	Significant
	Repair Booth F13	TC	3.750	7.84	5.73	0.162	8760	15.25	Small
	Wipestain Booth F4	WS	28.125	7.84	6.55	0.011	8760	8.88	Small
Desk Line #2	NGR #1 Booth F16	NGR	28.000	6.59	6.58	0.045	8760	36.31	Small
	NGR Booth F46	NGR	28.000	6.59	6.58	0.045	8760	36.31	Small
	SAP Booth F15	SAP	28.000	6.59	6.58	0.034	8760	27.44	Small
	SAP Booth F45	SAP	28.000	6.59	6.58	0.034	8760	27.44	Small
	Wipestain Booth F19	WS	28.000	7.84	6.55	0.011	8760	8.84	Small
	Topcoat #1 and #3 Booth F23	TC	28.000	7.84	5.73	0.162	8760	113.84	Major
	Topcoat #2 Booth F22	TC	28.000	7.84	6.49	0.162	8760	128.94	Major
	Topcoat #2 and Sealer Booth F28	TC	28.000	7.84	5.73	0.162	8760	113.84	Major
	Washcoat Booth F17	WC	28.000	6.92	6.49	0.057	8760	45.37	Significant
	Repair Booth F30	TC	1.250	7.84	5.73	0.162	8760	5.08	Small
	Repair Booth F10	TC	6.250	7.84	5.73	0.162	8760	25.41	Small
Desk Line #3	Wipestain Booth F27	WS	28.000	7.84	6.55	0.011	8760	8.84	Small
	Topcoat #1 and #3 Booth F29	TC	28.000	7.84	5.73	0.162	8760	113.84	Major
Desk Line #4	Topcoat and Sealer Booth F25	TC	6.250	7.84	5.73	0.162	8760	25.41	Small
	Repair Booth F24	TC	6.250	7.84	5.73	0.162	8760	25.41	Small
Desk Line #5	SAP/NGR #1 Booth F14	NGR	6.250	6.59	6.58	0.045	8760	8.11	Small
	Wipestain Booth F11	WS	6.250	7.84	6.55	0.011	8760	1.97	Small
	Topcoat Booth F8	TC	3.750	7.84	5.73	0.162	8760	15.25	Small
Desk Line #6	SAP/NGR #1 Booth F20	NGR	3.125	6.59	6.58	0.045	8760	4.05	Small
	Washcoat Booth F21	WC	6.250	6.92	6.49	0.057	8760	10.13	Small
	Topcoat and Sealer Booth C12	TC	6.250	7.84	5.73	0.162	8760	25.41	Small
	Wipestain Booth F26	WS	6.250	7.84	6.55	0.011	8760	1.97	Small
	Repair Booth F44	TC	1.250	7.84	5.73	0.162	8760	5.08	Small
Drawer Line	Drawer Enamel Booth F9	NGR	37.500	6.59	6.58	0.045	8760	48.63	Major
	Drawer Coat Booth F7	NGR	37.500	6.59	6.58	0.045	8760	48.63	Major
Chair Line	SAP Booth C1	SAP	67.500	6.59	6.58	0.034	8760	66.14	Significant
	SAP/NGR #1 Booth C3	NGR	10.000	6.59	6.58	0.045	8760	12.97	Small
	SAP/NGR #3 Booth C10	NGR	10.000	6.59	6.58	0.045	8760	12.97	Small
	Wipestain Booth C5	WS	87.500	7.84	6.55	0.011	8760	27.61	Small
	Sealer #1 Booth C8	SEALER	87.500	7.59	6.26	0.068	8760	163.14	Major
	Topcoat #1 and Sealer #2 Booth C7	TC	87.500	7.84	5.73	0.162	8760	355.76	Major
	Repair Booth C9	TC	9.000	7.84	5.73	0.162	8760	36.59	Significant
	Mix Booth C11	TC	1.000	7.84	5.73	0.162	8760	4.07	Small
Chair Line #2	NGR Booth C2	NGR	67.500	6.59	6.58	0.045	8760	87.54	Significant
	Topcoat #2 Booth C6	TC	87.500	7.84	5.73	0.162	8760	355.76	Major
	Wipestain Booth U5	WS	25.000	7.84	6.55	0.011	8760	7.89	Small
UV Line	Robotic Spray Booth U1	NGR	25.000	6.59	6.58	0.045	8760	32.42	Major
	Stain and Washcoat Booth U2	WC	25.000	6.92	6.49	0.057	8760	40.51	Significant
	Sealer Booth U4	SEALER	25.000	7.59	6.26	0.068	8760	46.61	Significant
Chair Line #4	Washcoat Both C4	WC	87.500	6.92	6.49	0.057	8760	141.78	Major
	NGR Booth U3	NGR	25.000	6.59	6.58	0.045	8760	32.42	Small
	Washcoat Booth U6	WC	25.000	6.92	6.49	0.057	8760	40.51	Significant
Woodmilling and Assembly Operations	Wood Milling Process DC4/6	NA	6622.650	NA	NA	NA	8760	0.00	Small
	Furniture Assembly Process DC4/6	NA	6622.650	NA	NA	NA	8760	0.00	Small
Insignificant Activities	Woodworking facilities DC7, DC11, and DC12	NA	NA	NA	NA	NA	8760	negl.	Small
	Grinding and machining operations	NA	NA	NA	NA	NA	8760	negl.	Small
	Natural gas-fired space heater	NA	NA	NA	NA	NA	8760	negl.	Small
	Paved and unpaved roads	NA	NA	NA	NA	NA	8760	negl.	Small
	Replacement or repair of electrostatic precipitators	NA	NA	NA	NA	NA	8760	negl.	Small
	Other activities with PM equal to or less than 5 lb/hr or 25 lb/day: woodworking operations and sawdust storage	NA	NA	NA	NA	NA	8760	negl.	Small
	Activities with VOC emissions equal to or less than 3 lb/hr or 15 lb/day: 2 dip tanks and 1 test booth	NA	NA	NA	NA	NA	8760	negl.	Small
							Total VOC PTE (tons/yr):	2950.83	

Line	Total PTE per Line	Small, Significant, Major
Desk Line 1	574.59	Major
Desk Line 2	568.82	Major
Desk Line 3	122.68	Major
Desk Line 4	50.82	Significant
Desk Line 5	25.32	Small
Desk Line 6	46.65	Significant
Drawer Line	97.27	Major
Chair Line	679.25	Major
Chair Line 2	451.19	Major
UV Line	119.54	Major
Chair Line 4	214.71	Major
Wood Milling and Assembly Operations	0.00	Small
Insignificant Acitivies	negl.	Small
Total VOC PTE	2950.83	

Appendix A: Coating Operation PM/PM10/PM2.5 PTE

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Line	Unit	Coating Material	Capacity Units/Hr	Density Lbs/Gal	Weight % Solid	Gal of Material (Gal/Unit)	Transfer Efficiency %	Potential Production (hours/Yr)	Uncontrolled PM PTE (tons/yr)	Control Efficieny %	Controlled PM PTE (tons/yr)
Desk Line #1	NGR #1 Booth F2	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.002	90%	0.000210297
	NGR #2 Booth G1	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.002	90%	0.000210297
	NGR #3 Booth F2A	NGR	9.375	6.59	0.15%	0.045	25%	8760	0.002	90%	0.000210297
	SAP #1 Booth F1	SAP	9.375	6.59	0.15%	0.034	25%	8760	0.002	90%	0.000158891
	SAP #2 Booth F18	SAP	9.375	6.59	0.15%	0.034	25%	8760	0.002	90%	0.000158891
	SAP #3 Booth F12	SAP	9.375	6.59	0.15%	0.034	25%	8760	0.002	90%	0.000158891
	Washcoat Booth F3	WC	28.125	6.92	6.21%	0.057	25%	8760	0.327	90%	0.032723905
	Washcoat/SAP Stain Booth F47	WC	28.000	6.92	6.21%	0.057	25%	8760	0.326	90%	0.032578465
	Topcoat #1 Booth F6A	TC	28.125	7.84	26.91%	0.162	25%	8760	4.028	90%	0.402818411
	Topcoat #2 Booth F6B	TC	28.125	7.84	26.91%	0.162	25%	8760	4.028	90%	0.402818411
	Topcoat #3 Booth F6	TC	28.125	7.84	26.91%	0.162	25%	8760	4.028	90%	0.402818411
	Sealer Booth F5	SEALER	28.125	7.59	17.52%	0.068	25%	8760	1.101	90%	0.110089699
	Repair Booth F13	TC	3.750	7.84	26.91%	0.162	25%	8760	0.537	90%	0.053709121
	Wipestain Booth F4	WS	28.125	7.84	16.45%	0.011	25%	8760	0.167	90%	0.016722232
Desk Line #2	NGR #1 Booth F16	NGR	28.000	6.59	0.15%	0.045	25%	8760	0.006	90%	0.000628088
	NGR Booth F46	NGR	28.000	6.59	0.15%	0.045	25%	8760	0.006	90%	0.000628088
	SAP Booth F15	SAP	28.000	6.59	0.15%	0.034	25%	8760	0.005	90%	0.000474555
	SAP Booth F45	SAP	28.000	6.59	0.15%	0.034	25%	8760	0.005	90%	0.000474555
	Wipestain Booth F19	WS	28.000	7.84	16.45%	0.011	25%	8760	0.166	90%	0.016647911
	Topcoat #1 and #3 Booth F23	TC	28.000	7.84	26.91%	0.162	25%	8760	4.010	90%	0.401028107
	Topcoat #2 Booth F22	TC	28.000	7.84	26.91%	0.162	25%	8760	4.010	90%	0.401028107
	Topcoat #2 and Sealer Booth F28	TC	28.000	7.84	26.91%	0.162	25%	8760	4.010	90%	0.401028107
	Washcoat Booth F17	WC	28.000	6.92	6.21%	0.057	25%	8760	0.326	90%	0.032578465
	Repair Booth F30	TC	1.250	7.84	26.91%	0.162	25%	8760	0.179	90%	0.017900868
	Repair Booth F10	TC	6.250	7.84	26.91%	0.162	25%	8760	0.895	90%	0.089504342
Desk Line #3	Wipestain Booth F27	WS	28.000	7.84	16.45%	0.011	25%	8760	0.166	90%	0.016647911
	Topcoat #1 and #3 Booth F29	TC	28.000	7.84	26.91%	0.162	25%	8760	4.010	90%	0.401028107
Desk Line #4	Topcoat and Sealer Booth F25	TC	6.250	7.84	26.91%	0.162	25%	8760	0.895	90%	0.089515202
	Repair Booth F24	TC	6.250	7.84	26.91%	0.162	25%	8760	0.895	90%	0.089504342
Desk Line #5	SAP/NGR #1 Booth F14	NGR	6.250	6.59	0.15%	0.045	25%	8760	0.001	90%	0.000140198
	Wipestain Booth F11	WS	6.250	7.84	16.45%	0.011	25%	8760	0.037	90%	0.003716051
	Topcoat Booth F8	TC	3.750	7.84	26.91%	0.162	25%	8760	0.537	90%	0.053709121
Desk Line #6	SAP/NGR #1 Booth F20	NGR	3.125	6.59	0.15%	0.045	25%	8760	0.001	90%	7.00991E-05
	Washcoat Booth F21	WC	6.250	6.92	6.21%	0.057	25%	8760	0.073	90%	0.007271979
	Topcoat and Sealer Booth C12	TC	6.250	7.84	26.91%	0.162	25%	8760	0.895	90%	0.089515202
	Wipestain Booth F26	WS	6.250	7.84	16.45%	0.011	25%	8760	0.037	90%	0.003716051
	Repair Booth F44	TC	1.250	7.84	26.91%	0.162	25%	8760	0.179	90%	0.017900868
Drawer Line	Drawer Enamel Booth F9	NGR	37.500	6.59	0.15%	0.045	25%	8760	0.008	90%	0.000831516
	Drawer Coat Booth F7	NGR	37.500	6.59	0.15%	0.045	25%	8760	0.008	90%	0.000831516
Chair Line	SAP Booth C1	SAP	67.500	6.59	0.15%	0.034	25%	8760	0.011	90%	0.001144017
	SAP/NGR #1 Booth C3	NGR	10.000	6.59	0.15%	0.045	25%	8760	0.002	90%	0.000224317
	SAP/NGR #3 Booth C10	NGR	10.000	6.59	0.15%	0.045	25%	8760	0.002	90%	0.000224317
	Wipestain Booth C5	WS	87.500	7.84	16.45%	0.011	25%	8760	0.520	90%	0.052024721
	Sealer #1 Booth C8	SEALER	87.500	7.59	17.52%	0.068	25%	8760	3.425	90%	0.342501285
	Topcoat #1 and Sealer #2 Booth C7	TC	87.500	7.84	26.91%	0.162	25%	8760	12.532	90%	1.253212835
	Repair Booth C9	TC	9.000	7.84	26.91%	0.162	25%	8760	1.289	90%	0.128886252
	Mix Booth C11	TC	1.000	7.84	26.91%	0.162	25%	8760	0.143	90%	0.014320695
Chair Line #2	NGR Booth C2	NGR	67.500	6.59	0.15%	0.045	25%	8760	0.015	90%	0.001514141
	Topcoat #2 Booth C6	TC	87.500	7.84	26.91%	0.162	25%	8760	12.532	90%	1.253212835
	Wipestain Booth U5	WS	25.000	7.84	16.45%	0.011	25%	8760	0.149	90%	0.014864206
UV Line	Robotic Spray Booth U1	NGR	25.000	6.59	0.15%	0.045	25%	8760	0.006	90%	0.000554344
	Stain and Washcoat Booth U2	WC	25.000	6.92	6.21%	0.057	25%	8760	0.291	90%	0.029087915
	Sealer Booth U4	SEALER	25.000	7.59	17.52%	0.068	25%	8760	0.979	90%	0.09785751
Chair Line #4	Washcoat Both C4	WC	87.500	6.92	6.21%	0.057	25%	8760	1.018	90%	0.101807704
	NGR Booth U3	NGR	25.000	6.59	0.15%	0.045	25%	8760	0.006	90%	0.000560793
	Washcoat Booth U6	WC	25.000	6.92	6.21%	0.057	25%	8760	0.291	90%	0.029087915
								Total Uncontrolled PM PTE:	69.128	Total Controlled PM PTE:	6.913

Line	Total PM/PM10/PM2.5 PTE per Line
Desk Line 1	14.55
Desk Line 2	13.62
Desk Line 3	4.18
Desk Line 4	1.79
Desk Line 5	0.58
Desk Line 6	1.18
Drawer Line	0.02
Chair Line	17.93
Chair Line 2	12.70
UV Line	1.27
Chair Line 4	1.31
Total Uncontrolled PM PTE:	69.13
Total Controlled PM PTE:	6.91

Appendix A: Baseline Booth Actuals - PM
Company Name: Paoli, Inc.

Appendix A: Coating Operation PM/PM10/PM2.5 Baseline Actual Emissions

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Line Name	New Unit Name	New Coating Material	Capacity Units/Hr	Density Lbs/Gal	Weight % Solid	Gal of Material (Gal/Unit)	Transfer Efficiency %	*Production Time (hours/Year)[1]	Uncontrolled PMAfter Modification	Control Efficieny %	Controlled PM After Modification
Desk Line #1	NGR #1 Booth E2	NGR	9.375	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #2 Booth E1	NGR	9.375	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #3 Booth E2A	NGR	9.375	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #4 Booth E1	NGR	9.375	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #5 Booth E18	NGR	9.375	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #6 Booth E12	NGR	9.375	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #7 Booth E3	NGR	28.125	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #8 Booth E47	NGR	28.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	Washcoat #1 Booth E6A	WC	28.125	6.92	6.21%	0.057	25%	2080	0.08	90%	0.01
	Sealer #1 Booth E6B	SEALER	28.125	7.59	17.52%	0.068	25%	2080	0.26	90%	0.03
	First Topcoat #1 Booth E6	TC	28.125	7.84	26.91%	0.162	25%	2080	0.96	90%	0.10
	Final Topcoat #2 Booth E5	TC	28.125	7.84	26.91%	0.162	25%	2080	0.96	90%	0.10
	Repair #1 Booth E13	TC	3.750	7.84	26.91%	0.162	25%	2080	0.13	90%	0.01
	Repair #2 Booth E4	TC	28.125	7.84	26.91%	0.162	25%	2080	0.96	90%	0.10
	Shade #1 Booth E16	NGR	28.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	Wipestain #1 Booth E46	WS	28.000	7.84	16.45%	0.011	25%	2080	0.04	90%	0.00
	Mix Booth E15	TC	28.000	7.84	26.91%	0.162	25%	2080	0.95	90%	0.10
Desk Line #2	NGR #9 Booth E45	NGR	28.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #10 Booth E19	NGR	28.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #11 Booth E23	NGR	28.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #12 Booth E22	NGR	28.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #13 Booth E28	NGR	28.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	Washcoat #2 Booth E17	WC	28.000	6.92	6.21%	0.057	25%	2080	0.08	90%	0.01
	Sealer #2 Booth E30	SEALER	1.250	7.59	17.52%	0.068	25%	2080	0.01	90%	0.00
	First Topcoat #2 Booth E10	TC	6.250	7.84	26.91%	0.162	25%	2080	0.21	90%	0.02
	Final Topcoat #2 Booth E27	TC	28.000	7.84	26.91%	0.162	25%	2080	0.95	90%	0.10
	Repair #3 Booth E29	TC	28.000	7.84	26.91%	0.162	25%	2080	0.95	90%	0.10
	Repair #4 Booth E25	TC	6.250	7.84	26.91%	0.162	25%	2080	0.21	90%	0.02
	Shade #2 Booth E24	NGR	6.250	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	Wipestain #2 Booth E14	WS	6.250	7.84	16.45%	0.011	25%	2080	0.01	90%	0.00
	Wipestain Booth E11	WS	6.250	7.84	16.45%	0.011	25%	2080	0.01	90%	0.00
	Topcoat Booth E8	TC	3.750	7.84	26.91%	0.162	25%	2080	0.13	90%	0.01
Drawer Line	Drawer Coat Booth E7	NGR	37.500	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
Chair Line #1	NGR #1 Booth C1	NGR	67.500	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	NGR #2 Booth C3	NGR	10.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	Sealer / First Topcoat #1 Booth	TC	10.000	7.84	26.91%	0.162	25%	2080	0.34	90%	0.03
	Final Topcoat #1 Booth C5	TC	87.500	7.84	26.91%	0.162	25%	2080	2.98	90%	0.30
	Repair #1 Booth C8	TC	87.500	7.84	26.91%	0.162	25%	2080	2.98	90%	0.30
	Repair #2 Booth C7	TC	87.500	7.84	26.91%	0.162	25%	2080	2.98	90%	0.30
Chair Line #2	NGR #3 Booth C9	NGR	9.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	Mix Booth C11	TC	1.000	7.84	26.91%	0.162	25%	2080	0.03	90%	0.00
	Final Topcoat #2 Booth C2	TC	67.500	7.84	26.91%	0.162	25%	2080	2.30	90%	0.23
	Repair #3 Booth C6	TC	87.500	7.84	26.91%	0.162	25%	2080	2.98	90%	0.30
	NGR #4 Booth C5	NGR	25.000	6.59	0.15%	0.045	25%	2080	0.00	90%	0.00
	Sealer / First Topcoat #3 Booth	TC	3.125	7.84	26.91%	0.162	25%	2080	0.11	90%	0.01
	Final Topcoat #3 Booth E21	TC	6.250	7.84	26.91%	0.162	25%	2080	0.21	90%	0.02
	Repair #4 Booth C12	TC	6.250	7.84	26.91%	0.162	25%	2080	0.21	90%	0.02
	Repair #5 Booth E26	TC	6.250	7.84	26.91%	0.162	25%	2080	0.21	90%	0.02
	Sealer / First Topcoat #2 Booth	TC	1.250	7.84	26.91%	0.162	25%	2080	0.04	90%	0.00
								Totals Yearly:	22.27		2.23

Line	Total Actual Yearly Controlled PTE per Line
Desk Line 1	0.43
Desk Line 2	0.26
Drawer Line	0.00
Chair Line	0.93
Chair Line 2	0.61
Total Yearly PM/PM10/ PM2.5 PTE:	2.23
2-Year Ave. PM/PM10/ PM2.5	2.23
Projected Future Actual PM/PM10/PM2.5	2.23

Notes:
* Paoli operates on a one shift per day, 5 days per week, 52 weeks per year production schedule and has done so for the previous ten (10) years.
The maximum number of hours that each unit could actualy run during any given year would be 2080 hours. Therefore yearly particulate emission is the same.

Methodology:
1) Production Time = One shift (8 hours) x Shifts per day (1) x Working days per week (5) x Weeks per year (52)
2) Uncontrolled PM After Modification = Capacity x Weight % Solids x Gal Material per Unit x (1 - Transfer Efficiency) x Production Time / 2000
3) Controlled PM After Modification = Uncontrolled PM After Modification x Controll Efficiency

PM/PM10/PM2.5 10-year Look Back

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Year	Month	Monthly PM Usage (tons)	Previous 11 Months PM Usage (tons)	12 Month Total PM Usage (tons)	24 Month Total PM Usage (tons)
2003	Jan	0.19	-	-	-
	Feb	0.19	-	-	-
	Mar	0.19	-	-	-
	Apr	0.19	-	-	-
	May	0.19	-	-	-
	Jun	0.19	-	-	-
	Jul	0.19	-	-	-
	Aug	0.19	-	-	-
	Sep	0.19	-	-	-
	Oct	0.19	-	-	-
	Nov	0.19	-	-	-
	Dec	0.19	2.09	2.28	-
2004	Jan	0.19	2.09	2.28	-
	Feb	0.19	2.09	2.28	-
	Mar	0.19	2.09	2.28	-
	Apr	0.19	2.09	2.28	-
	May	0.19	2.09	2.28	-
	Jun	0.19	2.09	2.28	-
	Jul	0.19	2.09	2.28	-
	Aug	0.19	2.09	2.28	-
	Sep	0.19	2.09	2.28	-
	Oct	0.19	2.09	2.28	-
	Nov	0.19	2.09	2.28	-
	Dec	0.19	2.09	2.28	4.56
2005	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2006	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2007	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2008	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2009	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2010	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2011	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2012	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2013	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2014	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56
2015	Jan	0.19	2.09	2.28	4.56
	Feb	0.19	2.09	2.28	4.56
	Mar	0.19	2.09	2.28	4.56
	Apr	0.19	2.09	2.28	4.56
	May	0.19	2.09	2.28	4.56
	Jun	0.19	2.09	2.28	4.56
	Jul	0.19	2.09	2.28	4.56
	Aug	0.19	2.09	2.28	4.56
	Sep	0.19	2.09	2.28	4.56
	Oct	0.19	2.09	2.28	4.56
	Nov	0.19	2.09	2.28	4.56
	Dec	0.19	2.09	2.28	4.56

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Description	Control Equipment Description	PM/PM10/PM2.5 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)	326 IAC 6-3-2 Particulate Emissions Limit (lbs/hr)	UNcontrolled PTE of PM/PM10/PM2.5 (tons/yr)
Wood Milling operation		99.90%	61,000.00	0.008	4.18	18.32	20.13	18,320.91
Furniture Assembly Operation	Baghouse DC4/6	99.90%	61,000.00	0.008	4.18	18.32	20.13	18,320.91
Grinding and Machining	Baghouse DC7/8	99.90%	4,000.00	0.03	1.03	4.51	7.37	4,505.14

Methodology:
Controlled PTE of PM/PM10 (lbs/hr) = Outlet grain Loading (grains/cf) * Exhaust Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr

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 =	21,500.00	lbs/hr	
	=	10.75	tons/hr	WoodMilling and Furniture Assembly
		2.4	tons/hr	Grinding and Machining

The use of baghouses ensures compliance with the allowable emission rate.

Wood Working Operation

Unit ID	Maximum process throughput-lbs/hr	Emission factor PM lbs/hr (a)	Uncontrolled PTE of PM/PM10/PM2.5 tons/yr	Control Efficiency	Controlled PTE PM/PM10/PM2.5 (tons/yr)
Woodworking operation	4,800.00	19.13	83.79	99.90%	0.08

(a) This was provided by the source as the amount of dust collected (lb/hr)

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.5	1020	4.29

	Pollutant						
	PM*	PM10*	direct PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.00	0.02	0.02	0.00	0.21	0.01	0.18

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobe	Formaldehyd	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	4.51E-06	2.58E-06	1.61E-04	3.86E-03	7.30E-06	4.04E-03
	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	1.07E-06	2.36E-06	3.01E-06	8.16E-07	4.51E-06	1.18E-05

Total HAPs	4.05E-03
Worst HAP	3.86E-03

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

Company Name: Paoli, Inc.
Source Address: 201 E. Martin St., Orleans, IN 47452
SSM No.: 117-36652-00014
SPM No.: 117-36444-00014
Reviewer: Aida DeGuzman

Sealed Air Instapak - 50W Foam Manufacturing PTE

The Instapak Foam is a product formed from a binary chemical system.
Instapak Component A and Component B combine to form a Chemical Base
that is used to create the foam.

VOC/HAP constituent(s) =	4-4' Methylenediphenyl diisocyanate ("MDI")	
Emission Factor (for MDI, from manufacturer)	0.000000036	lb MDI/lb binary chemical
Maximum Usage Rate of Component A	55,000.00	lb/yr
Maximum Usage Rate of Component B	35,250.00	lb/yr
Maximum Usage of Chemical Base	90,250.00	lb/yr
VOC/HAP Potential to Emit (pounds/year)	3.25E-03	lb/yr
VOC/HAP Potential to Emit (tons/year)	1.6245E-06	ton/yr

No Particulate is emitted

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 30, 2016

Mr. Jerry Roach
Paoli, Inc.
201 E Martin Street
Orleans, IN 47452

Re: Public Notice
Paoli, Inc.
Permit Level: Title V - SPM - PAL & Title V - Significant Source Modification
Permit Number: 117 - 36444 - 00014 & 117 - 36652 - 00014

Dear Mr. Roach:

Enclosed is a copy of your draft Title V - SPM - PAL & Title V - Significant Source Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Paoli News-Republican in Paoli, Indiana publish the abbreviated version of the public notice no later than March 31, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Orleans Public Library, 174 N. Maple St in Orleans IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Aida Deguzman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-4972 or dial (317) 233-4972.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 29, 2016

Paoli News-Republican
Attn: Classifieds
P.O. Box 190
Paoli, Indiana 47454

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Paoli, Inc., Orange County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than March 31, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V - SPM - PAL & Title V - Significant Source Modification
Permit Number: 117 - 36444 - 00014 & 117 - 36652 - 00014

Enclosure
PN Newspaper.dot 6/13/2013

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 30, 2016

To: Orleans Public Library 174 N. Maple St Orleans IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Paoli, Inc.
Permit Number: 117 - 36444 - 00014 & 117 - 36652 - 00014

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/17/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

March 30, 2016
Paoli, Inc.
117 - 36444 - 00014 & 117 - 36652 - 00014

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

March 30, 2016

A 30-day public comment period has been initiated for:

Permit Number: **117 - 36444 - 00014 & 117 - 36652 - 00014**
Applicant Name: **Paoli, Inc.**
Location: **Orleans, Orange County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Mail Code 61-53

IDEM Staff	LPOGOST 3/30/2016 Paoli, Incorporated 117 - 36444 - 00014 & 117 - 36652 - 00014 draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Jerry Roach Paoli, Incorporated 201 E Martin Street Orleans IN 47452 (Source CAATS)									
2		Dave Stagnolia Director of MCR Paoli, Incorporated 201 E Martin Street Orleans IN 47452 *(RO CAATS)*									
3		Mr. Alec Kalla 8733 W. Summit Circle Drive French Lick IN 47432 *(Affected Party)*									
4		Orleans Public Library 174 N. Maple St Orleans IN 47452 *(Library)*									
5		Orleans Town Council P.O. Box 271 Orleans IN 47452 *(Local Official)*									
6		Orange County Commissioners 205 East Main Street Paoli IN 47454 *(Local Official)*									
7		Orange County Health Department 205 E Main Street Paoli IN 47454-1591 *(Health Department)*									
8		John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
9		Tony DeMarco Bruce Carter Associates 616 S 4th Street Elkhart IN 46516 *(Consultant)*									
10		Bryan & Beth Newlin 4472 N SR 37 Orleans IN 47452 *(Affected Party)*									
11		Emanuel Miller 311 E CR 500 N Orleans IN 47452 *(Affected Party)*									
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

FACSIMILIE OF PS Form 3877