

# PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Kitchen Kompact, Inc.  
911 East 11th Street  
Jeffersonville, Indiana 47130**

(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.

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 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: **T-019-5891-00007**

Issued by:  
Janet G. McCabe, Assistant Commissioner  
Office of Air Management

Issuance Date:

**SECTION A**

**SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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)]

The Permittee owns and operates a stationary kitchen cabinet and miscellaneous wood fixture manufacturing plant.

Responsible Official: **Walt Gahm**  
Source Address: **911 East 11th Street, Jeffersonville, IN 47130**  
Mailing Address: **P.O. Box 868, Jeffersonville, IN 47131**  
Primary SIC Code: **2434, 2511**  
County Location: **Clark**  
County Status: Nonattainment for ozone  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, PSD Rules and Emission Offset  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) Twenty-seven (27) paint spray booths with a maximum rating of 1,000 units per hour, consisting of the following:

Four(4) paint spray booth located in building #46 S01-S04. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S01 through S04.

Four(4) paint spray booth located in building #46 S05-S08. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S05 through S08.

Four(4) paint spray booth located in building #46 S09-S12. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S09 through S12.

Five (5) paint spray booth located in building #47 S13-S17. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S13 through S17.

Five (5) paint spray booth located in building #47 S18-S22. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S18 through S22.

Five (5) paint spray booth located in building #47 S23-S27. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S23 through S27.

- (b) Seven (7) storage tanks, consisting of the following:

Five (5) 3,000 gallon stainless steel finishing material storage tanks T1 -T5. Emissions shall be exhausted at Stack/Vent ID #T1 through T5.

One (1) 2,000 gallon stainless steel storage tank T6. Emissions shall be exhausted at Stack/Vent ID #T6.

One (1) 12,000 gallon propane tank T7. Emissions shall be exhausted at Stack/Vent ID #T7.

(c) Woodworking operations, consisting of the following:

One (1) double-edged sander C4, with a maximum rating of 1647 pounds per hour. Emissions shall be controlled by baghouse dust collector, then exhausted at Stack/Vent ID #C4.

Woodworking operations in Building #46 WW46, with a maximum rating of 5126 pounds per hour. Emissions shall be controlled by baghouse dust collectors, then exhausted at Stack/Vent ID #C5 through C7.

Woodworking operations in Building #47 WW47, with a maximum rating of 5127 pounds per hour. Emissions shall be controlled by baghouse dust collectors, then exhausted at Stack/Vent ID #C1 through C3.

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

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

- (a) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

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

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

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

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

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

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

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

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance or modification; or for
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

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

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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, OAM, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

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

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provision [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of 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, OAM, 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 Management, Compliance Section),  
or  
Telephone Number: 317-233-5674 (ask for Office of Air Management, Compliance Section)  
Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAM may require that the Preventive Maintenance Plan required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

---

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

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

---

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, 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, OAM, 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, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

- (c) The Permittee may implement the 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.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

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

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

**B.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset), this source is a major source.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

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

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

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

**C.10 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

#### **C.11 Compliance Schedule [326 IAC 2-7-6(3)]**

---

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### **C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (c) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (d) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.14 Monitoring Methods [326 IAC 3]**

---

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.15 Pressure Gauge Specifications**

---

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

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

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, 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.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

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

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

- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM, shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM, within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM, reserves the authority to use enforcement activities to resolve noncompliant stack tests.
  
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM, that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM, may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

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

**C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. This annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
  
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
  
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.21 Monitoring Data Availability**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
  
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (c) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (d) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (e) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

---

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

**Stratospheric Ozone Protection**

**C.24 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

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

## **SECTION D.1 FACILITY OPERATION CONDITIONS - Woodworking Operations**

Facility Description [326 IAC 2-7-5(15)]: Woodworking operations, consisting of the following:

One (1) double-edged sander C4, with a maximum rating of 1647 pounds per hour. Emissions shall be controlled by baghouse dust collector, then exhausted at Stack/Vent ID #C4.

Woodworking operations in Building #46 WW46, with a maximum rating of 5126 pounds per hour. Emissions shall be controlled by baghouse dust collectors, then exhausted at Stack/Vent ID #C5 through C7.

Woodworking operations in Building #47 WW47, with a maximum rating of 5127 pounds per hour. Emissions shall be controlled by baghouse dust collectors, then exhausted at Stack/Vent ID #C1 through C3.

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

#### **D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), the allowable particulate matter (PM) emission rate from the woodworking processes shall not exceed 0.03 grain per dry standard cubic foot (dscf).

#### **D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

### **Compliance Determination Requirements**

#### **D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### **D.1.4 Particulate Matter (PM)**

The baghouse dust collectors for PM control shall be in operation at all times when the woodworking equipment is in operation.

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

#### **D.1.5 Visible Emissions Notations**

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

#### D.1.6 Baghouse Inspections

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

#### D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

#### D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## **SECTION D.2 FACILITY OPERATION CONDITIONS - Seven (7) storage tanks**

Facility Description [326 IAC 2-7-5(15)]: Seven (7) storage tanks, consisting of the following:

Five (5) 3,000 gallon stainless steel finishing material storage tanks T1 -T5. Emissions shall be exhausted at Stack/Vent ID #T1 through T5.

One (1) 2,000 gallon stainless steel storage tank T6. Emissions shall be exhausted at Stack/Vent ID #T6.

One (1) 12,000 gallon propane tank T7. Emissions shall be exhausted at Stack/Vent ID #T7.

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

#### D.2.1 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9, stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons are subject to the reporting and record keeping requirements set out in Conditions D.2.2 and D.2.3.

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

#### D.2.2 Record Keeping Requirements [326 IAC 8-9-6(a)]

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records at the facility showing the following:
- (1) The vessel identification number;
  - (2) The dimension of the storage vessel; and
  - (3) An analysis showing the capacity of the storage vessel.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.3 Reporting Requirements

An initial report to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the issuance of this permit, and thereafter, within thirty (30) days upon any changes made to these units.

## SECTION D.3 FACILITY OPERATION CONDITIONS - Surface Coating Operations

Facility Description [326 IAC 2-7-5(15)]: Surface coating operations with a maximum rating of 1,000 units per hour, consisting of the following:

Four(4) paint spray booth located in building #46 S01-S04. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S01 through S04.

Four(4) paint spray booth located in building #46 S05-S08. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S05 through S08.

Four(4) paint spray booth located in building #46 S09-S12. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S09 through S12.

Five (5) paint spray booth located in building #47 S13-S17. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S13 through S17.

Five (5) paint spray booth located in building #47 S18-S22. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S18 through S22.

Five (5) paint spray booth located in building #47 S23-S27. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S23 through S27.

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

#### D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), the allowable particulate matter (PM) emission rate from the surface coating operations shall not exceed 0.03 grain per dry standard cubic foot (dscf).

#### D.3.2 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.3.3 Wood Furniture Coatings [326 IAC 8-11]

Pursuant to 326 IAC 8-11, the requirements for the wood furniture manufacturing operations include the following conditions:

- (a) The VOC emissions shall be limited by the following:
  - (1) For wood furniture manufacturing operations using acid-cured alkyd amino vinyl sealers and acid-cured alkyd amino conversion varnish topcoats, the following:

- (A) The sealer shall contain no more than two and three tenths (2.3) pounds VOC per pound solids, as applied.
- (B) The topcoat shall contain no more than two (2.0) pounds VOC per pound solids, as applied.
- (b) The strippable spray booth coating shall contain no more than eight tenths (0.8) pounds VOC per pound solids, as applied.

D.3.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

D.3.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use a combination of (A), (B), and (C).
  - (2) Limit VHAP emissions contact adhesives as follows:
    - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pounds VHAP per pound solids.
    - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solid.
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
  - (3) The strippable spray booth material shall have a maximum VOC content of eight tenths (0.8) pounds VOC per pound solids.
- (c) A copy of this rule is enclosed.

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

#### D.3.7 Work Practice Standards [40 CFR 63.803]

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

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

#### D.3.8 Work Practice Standards [326 IAC 8-11-4]

The source shall prepare and maintain a written work practice implementation plan as specified in 326 IAC 8-11-4. The plan shall include the following conditions:

- (a) All equipment shall be maintained according to the manufacturer's specifications;
- (b) Spray guns shall be cleaned in an enclosed device that minimizes solvent evaporation, recirculates solvent for reuse, and collects solvent for disposal or recycling;
- (c) All finishing materials, gluing materials, cleaning materials, washoff materials, and organic solvents shall be stored in and pumped or drained in closed containers;
- (d) Conventional air spray guns shall not be used for applying finishing materials except as specified in 326 IAC 8-11-4(c);
- (e) Use closed tanks for washoff operations and drain parts to minimize dripping; and
- (f) An organic solvent accounting form shall be maintained to record the following:
  - (1) The quantity and type of organic solvent used each month for washoff and cleaning;
  - (2) The number of pieces washed off, and the reason for the washoff; and
  - (3) The quantity of spent solvent generated from each activity, and the quantity that is recycled on-site or disposed off-site each month.

### **Compliance Determination Requirements**

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

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Conditions D.3.1, D.3.3, and D.3.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### **D.3.10 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC content and usage limitations contained in Conditions D.3.3 and D.3.5 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, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### **D.3.11 Particulate Matter (PM)**

---

The dry filters for PM control shall be in operation at all times when the twenty-seven (27) paint booths (S01 through S27) are in operation.

#### **D.3.12 Monitoring**

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S01 through S27) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.3.13 Record Keeping Requirements**

---

- (a) To document compliance with Conditions D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.3.
  - (1) A list of each finishing material and strippable booth coating subject to the emission limitations in 326 IAC 8-11-3;
  - (2) The VOC and solids content, as applied, of each finishing material and strippable booth coating subject to the emission limitations in 326 IAC 8-11-3, and copies of data sheets documenting how the as-applied values were determined.
  - (3) Daily records of the solvent and finishing material additions to the continuous coater reservoir.
  - (4) Viscosity measurements.
  - (5) Copies of all compliance certification reports sent to IDEM.
- (b) To document compliance with Condition D.3.5, (NESHAP), 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 HAPs usage limits and/or the HAPs emission limits established in Condition D.3.5.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

- (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Conditions D.3.7, and D.3.8, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plans.
  - (d) To document compliance with Condition D.3.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
  - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.14 Reporting Requirements

- (a) A semi-annual Compliance Report to document compliance with Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.
- (b) An Initial Compliance Report to document compliance with Condition D.3.5, and the Certification form, shall be submitted within sixty (60) days following the compliance date of November 21, 1997. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

- (1) November 21, 1997 through May 20, 1998.
- (2) May 21 through November 30, 1998.
- (3) December 1 through December 31, 1998.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

- (d) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
- (e) The reports required in (b), (c) and (d) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

## **SECTION D.4 FACILITY OPERATION CONDITIONS - Insignificant Activities**

Facility Description [326 IAC 2-7-5(15)]: Insignificant activities, consisting of the following:

VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

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

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

#### **D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), the allowable particulate matter (PM) emission rate from the brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed 0.03 grain per dry standard cubic foot (dscf).

#### **D.4.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]**

Pursuant to 326 IAC 8-9, stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons are subject to the record keeping and reporting requirements set out in Conditions D.4.4 and D.4.5.

### **Compliance Determination Requirements**

#### **D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### **D.4.4 Record Keeping Requirements [326 IAC 8-9-6(a)]**

- (a) To document compliance with Condition D.4.2, the Permittee shall maintain records at the facility showing the following:
- (1) The vessel identification number;
  - (2) The dimension of the storage vessel; and
  - (3) An analysis showing the capacity of the storage vessel.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D 4.5 Reporting Requirements**

An initial report to document compliance with Condition D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the issuance of this permit, and thereafter, within thirty (30) days upon any changes made to these units

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

**PART 70 OPERATING PERMIT  
CERTIFICATION FORM**

Source Name: **Kitchen Kompact, Inc.**  
Source Address: **911 East 11th Street, Jeffersonville, Indiana 47130**  
Mailing Address: **P.O. Box 868, Jeffersonville, Indiana 47131**  
Part 70 Permit No.: **T-019-5891-00007**

**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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

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

Source Name: **Kitchen Kompact, Inc.**  
Source Address: **911 East 11th Street, Jeffersonville, Indiana 47130**  
Mailing Address: **P.O. Box 868, Jeffersonville, Indiana 47131**  
Part 70 Permit No.: **T-019-5891-00007**

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
- C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**PART 70 OPERATING PERMIT**  
**SEMI-ANNUAL REPORT FORM**  
 For HAPs Usage - Wood Furniture NESHAP

Source Name: **Kitchen Kompact, Inc.**  
 Source Address: **911 East 11th Street, Jeffersonville Indiana 47130**  
 Mailing Address: **P.O. Box 868, Jeffersonville, IN 47131**  
 Part 70 Permit No.: **T-019-5891-00007**  
 Facility: Surface Coating  
 Parameter: HAPs - NESHAP  
 Limit: Finishing operations - 1.0 lb HAP/lb Solids  
 Foam adhesives (meeting upholstered flammability requirements) -1.8 lb HAP/lb Solids  
 All other contact adhesives - 1.0 lb HAP/lb Solids  
 Thinners (on-site formulation) - 3% HAP content by weight  
 All other thinner mixtures - 10% HAP content by weight  
 Strippable spray booth coating - 0.8 lb VOC/lb solids

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

Month	Finishing Operations (lb HAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb HAP/lb solid)	Contact Adhesives (lb HAP/lb solid)	Spray Booth coating (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

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

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

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

**PART 70 OPERATING PERMIT**  
**SEMI-ANNUAL REPORT FORM**  
VOC Usage

Source Name: **Kitchen Kompact, Inc.**  
Source Address: **911 East 11th Street, Jeffersonville, Indiana 47130**  
Mailing Address: **P.O. Box 868, Jeffersonville, IN 47131**  
Part 70 Permit No.: **T-019-5891-00007**  
Facility: Surface Coating  
Parameter: VOC  
Limit: Topcoat & Sealers Systems:  
1) Acid Cured Topcoat - 2.0 lb VOC/ lb solids  
2) Acid Cured Sealer - 2.3 lb VOC/ lb solids  
  
Strippable spray booth coating - 0.8 lb VOC/lb solids

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

Month	Topcoat & Sealer - Acid cured topcoat	Topcoat & Sealer - Acid cured sealer	Strippable spray booth coating
1			
2			
3			
4			
5			
6			

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.  
Deviation has been reported on: \_\_\_\_\_

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

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

**PART 70 OPERATING PERMIT**  
**QUARTERLY COMPLIANCE MONITORING REPORT FORM**

Source Name: **Kitchen Kompact, Inc.**  
Source Address: **911 East 11th Street, Jeffersonville, Indiana 47130**  
Mailing Address: **P.O. Box 868, Jeffersonville, IN 47131**  
Part 70 Permit No.: **T-019-5891-00007**

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Management

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

### Background And Description

**Source Name:** Kitchen Kompact, Inc.  
**Source Location:** 911 East 11th Street, Jeffersonville, IN 47130  
**County:** Clark  
**Operation Permit No.:** T-019-5891-00007  
**Permit Reviewer:** Melissa Groch

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Kitchen Kompact, Inc. relating to the operation of a kitchen cabinet and miscellaneous wood fixture manufacturing plant.

### Permitted Emission Units and Pollution Control Equipment

This source presently consists of the following emission units and pollution control devices, which have been granted various levels of approval under 326 IAC 2:

- (a) Surface coating operations with a maximum rating of 1,000 units per hour, consisting of the following:
- Four(4) paint spray booth located in building #46 S01-S04. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S01 through S04.
  - Four(4) paint spray booth located in building #46 S05-S08. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S05 through S08.
  - Four(4) paint spray booth located in building #46 S09-S12. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S09 through S12.
  - Five (5) paint spray booth located in building #47 S13-S17. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S13 through S17.
  - Five (5) paint spray booth located in building #47 S18-S22. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S18 through S22.
  - Five (5) paint spray booth located in building #47 S23-S27. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S23 through S27.
- (b) Seven (7) storage tanks, consisting of the following:
- Five (5) 3,000 gallon stainless steel finishing material storage tanks T1 -T5. Emissions shall be exhausted at Stack/Vent ID #T1 through T5.
  - One (1) 2,000 gallon stainless steel storage tank T6. Emissions shall be exhausted at Stack/Vent ID #T6.
  - One (1) 12,000 gallon propane tank T7. Emissions shall be exhausted at Stack/Vent ID #T7.

- (c) Woodworking operations, consisting of the following:

One (1) double-edged sander C4, with a maximum rating of 1647 pounds per hour. Emissions shall be controlled by baghouse dust collector, then exhausted at Stack/Vent ID #C4.

Woodworking operations in Building #46 WW46, with a maximum rating of 5126 pounds per hour. Emissions shall be controlled by baghouse dust collectors, then exhausted at Stack/Vent ID #C5 through C7.

Woodworking operations in Building #47 WW47, with a maximum rating of 5127 pounds per hour. Emissions shall be controlled by baghouse dust collectors, then exhausted at Stack/Vent ID #C1 through C3.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)**

There are no new facilities to be reviewed under the ENSR process.

### **Insignificant Activities**

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

- (a) Emergency gasoline generators not exceeding 110 horsepower.
- (b) Paved and unpaved roads and parking lots with public access.
- (c) Propane or liquified petroleum gas, or butane-fired combustion unit(s) with heat input equal to or less than six million (6,000,000) Btu per hour.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (f) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (g) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

### **Existing Approvals**

The source has been operating under the following approvals:

- (a) OP 10-04-89-0200, issued on April 30, 1985.
- (b) OP 10-04-89-0201, issued on April 30, 1985.
- (c) OP 10-04-89-0202, issued on April 30, 1985.

- (d) OP 10-04-89-0203, issued on April 30, 1985.
- (e) OP 10-04-89-0204, issued on April 30, 1985.
- (f) OP 10-04-89-0205, issued on April 30, 1985.
- (g) OP 10-04-89-0206, issued on April 30, 1985.
- (h) OP 10-04-89-0207, issued on April 30, 1985.
- (i) Exemption 019-3738-00007 issued on June 28, 1994.

### Enforcement Issues

There are no Enforcement actions pending against this emission source.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

An incomplete Part 70 permit application for the purposes of this review was received on May 20, 1996. The Part 70 permit application was rendered administratively complete on May 30, 1997.

Information used in this review was derived from the application and from additional information submitted by the applicant, unless otherwise stated.

### Emission Calculations

See *Appendix A* of this document for detailed emissions calculations. (4 pages)

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Emissions (Tons per Year)
CO	0
HAPS(Single)	greater than 10
HAPS(Total)	greater than 25
LEAD	0
NOX	0
PM	greater than 100
PM10	greater than 100
SO2	0
VOC	greater than 100

- (a) The potential emissions (as defined in the Indiana Rule) of VOCs and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects 1995 emission data.

<u>Pollutant</u>	<u>Emissions (Tons per Year)</u>
CO	0.00
HAPS(Single)	136.84
HAPS(Total)	287.95
LEAD	0.00
NOX	0.00
PM	53.52
PM10	53.52
SO2	0.00
VOC	852.79

### County Attainment Status

This emission source is located in Clark County, which has the following attainment designations for criteria pollutants:

<u>Pollutant</u>	<u>Designation</u>
CO	Attainment
LEAD	Attainment
NOX	Attainment
PM	Attainment
PM10	Attainment
SO2	Attainment
VOC	Nonattainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for ozone.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

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

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

- (a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
  - (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
  - (2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10.0%) maximum VHAP content by weight; or
  - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
  - (4) Use a combination of (1), (2), and (3).
- (b) Limit VHAP emissions contact adhesives as follows:
  - (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.
  - (2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
  - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (d) The source shall complete a work practice implementation plan within sixty (60) calendar days after the source's compliance date as specified in 40 CFR 63.803. The plan must detail how the source will incorporate environmentally desirable practices into operation.
- (e) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating operations.

- (f) A copy of this rule is enclosed.

### **State Rule Applicability - Entire Source**

#### **326 IAC 4-1-2 (Open Burning)**

Pursuant to 326 IAC 4-1-2, the applicant 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.

#### **326 IAC 5-1-2 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:

- (a) Visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings, and
- (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 6-4 (Fugitive Emissions)**

Pursuant to 326 IAC 6-4, fugitive dust shall not be visibly crossing the property lines except as provided in 326 IAC 6-4-6 (Exceptions).

### **State Rule Applicability - Woodworking operations**

#### **326 IAC 6-3-2 (Process Operations)**

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking processes shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Based on a process weight rate of 1647 pounds per hour, the PM emissions from C4 shall not exceed 3.60 pounds per hour.

Based on a process weight rate of 5126 pounds per hour, the PM emissions from WW46 shall not exceed 7.70 pounds per hour.

Based on a process weight rate of 5127 pounds per hour, the PM emissions from WW47 shall not exceed 7.70 pounds per hour.

### **State Rule Applicability - Seven (7) storage tanks T1-T7**

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-6, records shall be maintained for the life of each vessel regarding the vessel identification number, the vessel dimensions, and the vessel capacity.

### **State Rule Applicability - Surface Coating Operations**

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter (PM) emission rate from surface coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### 326 IAC 8-2-12 (Surface Coating of Furniture)

Pursuant to 326 IAC 8-2-12, the surface coatings applied to wood furnishings shall utilize only 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 spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a 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.

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

Pursuant to 326 IAC 8-11, the requirements for the wood furniture manufacturing operations include the following conditions:

- (a) The VOC emissions shall be limited by the following:
  - (1) For wood furniture manufacturing operations using acid-cured alkyd amino vinyl sealers and acid-cured alkyd amino conversion varnish topcoats, the following:
    - (A) The sealer shall contain no more than two and three tenths (2.3) pounds VOC per pound solids, as applied.
    - (B) The topcoat shall contain no more than two (2.0) pounds VOC per pound solids, as applied.

- (b) The strippable spray booth coating shall contain no more than eight tenths (0.8) pounds VOC per pound solids, as applied.
- (c) The source shall follow work practice standards as specified in 326 IAC 8-11-4.
- (d) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating operations.

### State Rule Applicability - Insignificant Activities

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter (PM) emission rate shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-6, records shall be maintained for the life of each vessel regarding the vessel identification number, the vessel dimensions, and the vessel capacity.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for response steps 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 response steps within a specific time period.

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

The surface coating operations have applicable compliance monitoring conditions as specified below:

- (a) The dry filters for PM control shall be in operation at all times when the twenty-seven (27) paint booths (S01 through S27) are in operation.

- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

The Woodworking operations have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the woodworking operations shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the following ranges or as established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
  - (1) Baghouse #1 - 1.0 to 3.0 inches of water
  - (2) Baghouse #2 - 1.0 to 3.5 inches of water
  - (3) Baghouse #3 - 6.0 to 9.0 inches of water
  - (4) Baghouse #4 - 2.5 to 5.5 inches of water
  - (5) Baghouse #5 - 6.0 to 9.0 inches of water
  - (6) Baghouse #6 - 1.0 to 4.0 inches of water
  - (7) Baghouse #7 - 1.0 to 3.0 inches of water

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

These monitoring conditions are necessary because the baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Hazardous Air Pollutant (HAP) Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly emitted by industries. They are listed as hazardous air pollutants (HAPs) on the Office of Air Management (OAM) Application Form GSD-08.

This emission source emits levels of hazardous air pollutants greater than those which constitute a major source according to Section 112 of the Clean Air Act.

### **Conclusion**

The operation of this kitchen cabinet and miscellaneous wood fixture manufacturing plant will be subject to the conditions of the attached proposed **Part 70 Permit No. T-019-5891-00007**.

**Table A: Surface Coating Operations**

<b>Description of facility:</b>	Twelve (12) paint spray booths in building #46	Fifteen (15) paint spray booths in building #47
<b>Max Rating:</b>	1000 units / hour	1000 units / hour
<b>Construction Date:</b>	1973	1960
<b>Control Device (if any):</b>	dry filter	dry filter
<b>Stack/Vent ID:</b>	S01 through S12	S13 through S27

**Facility class:** 023      **Description:** Surface Coating of: Miscellaneous Wood

EMISSION LIMITATIONS		PM	VOC	VHAPs
<b>Numerical Emission Limit:</b>	none	$E = 4.10 P^{0.67}$	Acid cured sealers - 2.3 lb VOC/lb solids Acid cured topcoats - 2.0 lb VOC/lb solids Strippable spray booth coating - 0.8 lb VOC/lb solids	Finishing operations - 1.0 lb VHAP/lb Solids Thinners (on-site formulation) - 3% VHAP All other thinners + solvents - 10% VHAP Foam adhesives (upholstered) - 1.8 lb VHAP/lb solids All other adhesives - 1.0 lb VHAP/lb solids Strippable spray booth coating - 0.8 lb VOC/lb solids
<b>Regulation/Citation:</b>	326 IAC 8-2-12	326 IAC 6-3-2	326 IAC 8-11	40 CFR 63, subpart JJ
<b>Compliance Demonstration:</b>	---	---	---	Record keeping + reporting
<b>PERFORMANCE TESTING</b>				
<b>Parameter/Pollutant to be Tested:</b>	---	---	---	---
<b>Testing Method/Analysis:</b>	---	---	---	---
<b>Testing Frequency/Schedule:</b>	---	---	---	---
<b>Submittal of Test Results:</b>	---	---	---	---
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	Regulated Application Methods	Visible emissions	Compliance coating	---
<b>Monitoring Method:</b>	Use Equipment Approved Under 326 IAC 8-2-12	Visible Emissions	Keep MSDS sheets on file	---
<b>Monitoring Regulation/Citation:</b>	326 IAC 8-2-12	326 IAC 6-3-2	326 IAC 8-11-3	---
<b>Monitoring Frequency:</b>	---	Daily, weekly	---	---
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	---	Normal or Abnormal	As listed in 326 IAC 8-11-8	Coating Usage / VHAPs
<b>Recording Frequency:</b>	---	Daily, weekly	Daily	Monthly, daily
<b>Submittal Schedule of Reports:</b>	---	---	Semi-annually	Semi-annually
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	---	---	As listed in 326 IAC 8-11-9	VHAP content / VHAP usage
<b>Reporting Frequency/Submittal:</b>	---	---	Semi-annually	Semi-annually

**Table B: Woodworking Operations**

<b>Description of facility:</b>	Woodworking operations in Building #46	One (1) double-edged sander	Woodworking operations in Building #47
<b>Max Rating:</b>	5126 pounds / hour	1647 pounds / hour	5127 pounds / hour
<b>Construction Date:</b>	1973	June 28, 1994	1960
<b>Control Device (if any):</b>	Baghouse dust collector	Baghouse dust collector	Baghouse dust collector
<b>Stack/Vent ID:</b>	C1 through C3	C4	C5 through C7

**Facility class:** 030      **Description:** Woodworking

<b>EMISSION LIMITATIONS</b>		PM
<b>Numerical Emission Limit:</b>	E = 4.10 P <sup>0.67</sup>	
<b>Regulation/Citation:</b>	326 IAC 6-3-2	
<b>Compliance Demonstration:</b>	---	
<b>PERFORMANCE TESTING</b>		
<b>Parameter/Pollutant to be Tested:</b>	---	
<b>Testing Method/Analysis:</b>	---	
<b>Testing Frequency/Schedule:</b>	---	
<b>Submittal of Test Results:</b>	---	
<b>COMPLIANCE MONITORING</b>		
<b>Monitoring Description:</b>	Sawdust Controls, visible emissions	
<b>Monitoring Method:</b>	Inspect for Sawdust Accumulation, pressure drop	
<b>Monitoring Regulation/Citation:</b>	---	
<b>Monitoring Frequency:</b>	daily	
<b>RECORD KEEPING</b>		
<b>Parameter/Pollutant to be Recorded:</b>	pressure drop, visual emissions	
<b>Recording Frequency:</b>	daily	
<b>Submittal Schedule of Reports:</b>	---	
<b>REPORTING REQUIREMENTS</b>		
<b>Information in Report:</b>	---	
<b>Reporting Frequency/Submittal:</b>	---	

**Table C: Seven (7) Storage Tanks**

**Description of facility:** Five (5) 3,000 gallon stainless steel storage tanks  
 One (1) 2,000 gallon stainless steel storage tank  
 One (1) 12,000 gallon propane tank

**Max Rating:**

**Construction Date:**

**Control Device (if any):** None

**Stack/Vent ID:** T1 through T7

**Facility class:** 069                      **Description:** Storage Tank (VOC)

<b>EMISSION LIMITATIONS</b>				
<b>Numerical Emission Limit:</b>	---			
<b>Regulation/Citation:</b>	326 IAC 8-9-6			
<b>Compliance Demonstration:</b>	---			
<b>PERFORMANCE TESTING</b>				
<b>Parameter/Pollutant to be Tested:</b>	---			
<b>Testing Method/Analysis:</b>	---			
<b>Testing Frequency/Schedule:</b>	---			
<b>Submittal of Test Results:</b>	---			
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	---			
<b>Monitoring Method:</b>	---			
<b>Monitoring Regulation/Citation:</b>	---			
<b>Monitoring Frequency:</b>	---			
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	ID#, dimensions, capacity			
<b>Recording Frequency:</b>	life of vessel			
<b>Submittal Schedule of Reports:</b>	annually			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	Id#, dimensions, capacity			
<b>Reporting Frequency/Submittal:</b>	annually			

# Indiana Department of Environmental Management Office of Air Management

## Addendum to the Technical Support Document for Part 70 Operating Permit

**Source Name:** Kitchen Kompact, Inc.  
**Source Location:** 911 East 11<sup>th</sup> Street, Jeffersonville, Indiana  
**County:** Clark County  
**SIC Code:** 2434, 2511  
**Operation Permit No.:** T019-5891-00007  
**Permit Reviewer:** Melissa Groch

On November 10, 1997, the Office of Air Management (OAM) had a notice published in The Clark County Evening News, Jeffersonville, Indiana, stating that Kitchen Kompact, Inc. had applied for a Part 70 Operating Permit to operate a stationary kitchen cabinet and miscellaneous wood fixture manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 9, 1998, via telephone, Walter Gahm of Kitchen Kompact, commented on the proposed Part 70 permit. The comment is as follows (changes are bolded for emphasis, and previous language changed or deleted has ~~strikeout~~ through it):

### Comment 1:

Kitchen Kompact, Inc. requests the deletion of Parametric Monitoring for section D.1.6. In turn, Baghouse Inspections, is preferred for this section.

### Response to Comment 1:

Condition D.1.6 has been changed in the final permit as requested by Kitchen Kompact, Inc. This change reads as follows:

#### D.1.6 ~~Parametric Monitoring~~ Baghouse Inspections

~~The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the following ranges or as established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

- ~~(1) Baghouse #1 1.0 to 3.0 inches of water~~
- ~~(2) Baghouse #2 1.0 to 3.5 inches of water~~
- ~~(3) Baghouse #3 6.0 to 9.0 inches of water~~
- ~~(4) Baghouse #4 2.5 to 5.5 inches of water~~
- ~~(5) Baghouse #5 6.0 to 9.0 inches of water~~
- ~~(6) Baghouse #6 1.0 to 4.0 inches of water~~
- ~~(7) Baghouse #7 1.0 to 3.0 inches of water~~

~~The instrument used for determining the pressure shall comply with Section C Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.~~

Upon further review, OAM has incorporated the following changes into the final Part 70 permit (changes are bolded for emphasis, and previous language changed or deleted has ~~strikeout~~ through it).

Because of descriptive and grammatical changes, the following corrections are made to the final Part 70 permit:

1. In Section A, the Source Summary has been changed to read:

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~ **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.**

2. Condition A.5 has been deleted. Language has been added to B.14, Permit Shield, to address the effect of prior permit conditions. It previously read as follows:

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

The Table of Contents has also been changed to reflect this deletion.

3. Condition B.1(b), Permit No Defense, has been modified to read:

This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Part (c) of Condition B.8, Duty to Supplement and Provide Information, is changed to read:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

~~Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).~~

5. In B.11, Annual Compliance Certification, the first part of (a) has been modified from the original and part (c) has language added to read:

(a) The Permittee shall annually ~~certify that the source had complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
  - (5) Any insignificant activity that has been added without a permit revision; and**
  - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12(a), Preventive Maintenance Plan, has been changed to read as follows:
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

**Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

7. All parts in Condition B.14, Permit Shield, have been changed to read as follows:
- (a) ~~Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided either of the following:~~
- ~~(1) The applicable requirements are included and specifically identified in this permit;~~
  - ~~(2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~

**This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

- (b) ~~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.~~ **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:**
- (1) **The applicable requirements are included and specifically identified in this permit; or**
  - (2) **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement **that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit**, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) ~~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.~~

**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.**

- (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(e)(2) (trading based on State Implementation Plan (SIP) provisions).~~ Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) ~~This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(e)(7)]~~ **This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).**
- (g) ~~This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]~~ **This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]**
- (h) **This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]**
8. In Condition B.16, Deviations from Permit Requirements and Conditions, parts (b) and (c) have been changed, and a part (d) has been added to read:
- (b) ~~Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
  - (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
  - (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
  - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.**
- (c) ~~Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~ **Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (d) **Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.**
9. Condition B.18, Permit Renewal, has a rule cite added to the second sentence of part (a). It now reads as:
- 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).**
10. Conditions B.19, Administrative Permit Amendment, B.20, Minor Permit Modification, and B.21, Significant Permit Modification, have all been combined into one condition numbered B.19, Permit Amendment or Modification, shown below. The previous Conditions, B.20 and B.21, have been deleted, and the remainder of Section B has been renumbered accordingly. The new B.19 condition reads as follows:

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

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

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

Also, the Table of Contents has been changed accordingly.

11. Condition B.26, now B.24, Inspection and Entry, has a minor change in the first sentence. It reads as follows:

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

Also, language has been added to part (e) of this condition which reads as follows:

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

12. In Condition B.25, previously B.27, Transfer of Ownership or Operation, part (b) has language added. It now reads as follows:

- (b) **The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

13. Condition B.28, now B.26, Annual Fee Payment, is changed to read:
- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.**
  - (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
  - (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

14. A new condition, C.2, Particulate Matter Emission Limitations for Processes with Process Weight Rates Less than One Hundred pounds per hour, has been added to Section C. It reads as follows:

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

---

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

The remaining conditions in this section have been renumbered, and the Table of contents reflects this change as well.

15. In condition C.2, Opacity, now C.3, a rule modification has changed the condition to read as:
- Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:
- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
  - (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ 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 overlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

~~This condition is not federally enforceable.~~

16. The last sentence in condition C.3, Open Burning, now C.4, has been modified as follows:
- ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.**
17. In condition C.4, Incineration, now C.5, the phrase "This condition is not federally enforceable" has been deleted from the original statement.
18. The last sentence in C.5, Fugitive Dust Emissions, now C.6, has been modified to:
- ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~

19. C.6, Operation of Control Equipment, now C.7, has been modified to read as follows:

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation, ~~as described in Section D of this permit.~~

20. Condition C.7, now C.8, Stack Height, has been changed to read:

- ~~(a)~~ The Permittee shall comply with the **applicable** provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- ~~(b)~~ ~~Any change in an applicable stack shall require prior approval from IDEM, OAM.~~

21. The previous original language from Condition C.13, with the exception of the second sentence in part (d), has been listed in C.8, now C.9, Asbestos Abatement Projects, and reads as follows:

~~C.8 9~~ Asbestos Abatement Projects ~~—Accreditation~~ [326 IAC 14-10] [326 IAC 18] [40 CFR 61  
~~Subpart M.140]~~

---

~~Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.~~

- (a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**
- (b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
- (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
- (2) **If there is a change in the following:**
- (A) **Asbestos removal or demolition start date;**
- (B) **Removal or demolition contractor; or**
- (C) **Waste disposal site.**
- (c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) **The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

**All required notifications shall be submitted to:**

**Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

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

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

22. The rule cite, and the first sentence in C.9(a), Performance Testing, now C.10, is changed to:

C.10 Performance Testing [326 IAC ~~3-2-1~~ 3-6]

All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

Also the sentence below has been added to the end of part (a).

**The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

And after part (b), the following sentence was added:

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

Also changed is the rule cite in the Table of Contents for this condition.

23. Condition C.10, now C.11, Compliance Schedule, has been revised to:

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit, and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

24. Condition C.11, Compliance Monitoring, now listed as C.12, is changed to read:

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend the compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

25. Condition C.13 , Monitoring Methods, now C.14, reads as follows with the addition of one word:

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

26. Condition C.16, Emergency Reduction Plans, has a sentence added to the last part of (b). It reads as:

**The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

Also, part (c) has been changed to read:

If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.~~

27. Condition C.17, Risk Management Plan, has a language change in the first sentence to read:

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

Also, a sentence has been added to the end of this condition. It reads as:

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

28. Condition C.18, Compliance Monitoring Pan- Failure to Take Response Steps, has two new rule cites added as follows:

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(9)]**[326 IAC 2-7-6] [326 IAC 1-6]**

---

Also, the Table of Contents has also been modified to reflect this change.

29. Condition C.19, has two rule cites added to the first line. They are as follows:

**C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

Also, the Table of Contents has been modified to reflect this rule cite addition, and the sentence below has been added to the end of this condition.

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

30. C.20, Emission Statement, part (a) has been modified to read:

(a) The Permittee shall submit ~~an certified,~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. This annual emission statement shall meet the following requirements:

- (1) ~~Contain~~ **Indicate** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting)
- (2) ~~Contain~~ **Indicate** actual emissions of other regulated pollutants from the source, for purpose of part 70 fee assessment.

31. In condition C.22, General Record Keeping Requirements, the rule cites have changed and part (a) has been modified to read:

**C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] [326 IAC 2-7-6]**

---

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available ~~within one (1) hour upon verbal the request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request providing they are made available within thirty (30) days after a written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

The Table of Contents has also been modified to reflect this change.

32. C.23, General Reporting Requirements, has been revised to:

(a) ~~Reports required by conditions in Section D of this permit shall be submitted to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
400 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~

**To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

- (b) ~~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, OAM, on or before the date it is due. The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

- (c) ~~Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. 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, OAM, on or before the date it is due.~~

- (d) ~~All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

- (1) ~~an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- (2) ~~an emergency as defined in 326 IAC 2-7-1(12); or~~
- (3) ~~failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
- (4) ~~failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation. Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.~~

- (e) ~~Any corrective actions or response steps taken as a result of each deviation~~ **All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.**

- (f) ~~The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

- (g) **The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.**

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

33. In the equipment description box under Facility Operation Conditions for Sections D.1, D.2, D.3, and D.4, the following phrase has been added:

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

34. In Section D.1, the rule has been changed because the draft permit and TSD listed an incorrect rule as applicable to the source. Since the source is located in Clark County, 326 IAC 6-1 applies rather than 326 IAC 6-3. Therefore, Condition D.1.1 is modified to read as follows:

D.1.1 Particulate Matter (PM) [326 IAC ~~6-3-2(e)~~ 6-1-2]

Pursuant to 326 IAC ~~6-3-2(e)~~ (Process Operations) **6-1-2 (Particulate Emission Limitations)**, the allowable particulate matter (PM) emission rate from the woodworking processes shall not exceed the pound per hour emission rate established as E in the following formula: **0.03 grain per dry standard cubic foot (dscf).**

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

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

~~Based on a process weight rate of 1647 pounds per hour, the PM emissions from C4 shall not exceed 3.60 pounds per hour.~~

~~Based on a process weight rate of 5126 pounds per hour, the PM emissions from WW46 shall not exceed 7.70 pounds per hour.~~

~~Based on a process weight rate of 5127 pounds per hour, the PM emissions from WW47 shall not exceed 7.70 pounds per hour.~~

Since the OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above condition modification serve as a record for this documentation. Therefore, no change as a result of the above modification has been recorded in the TSD.

In addition, the Table of Contents has also been changed to reflect the new rule cite.

35. In all instances where the Preventive Maintenance Plan is listed, the rule citation was changed. The affected sections are D.1.2 and D.3.5, and their corresponding listings in the Table of Contents. They now read as follows:

D.1.2, D.3.5 Preventive Maintenance Plan [326 IAC ~~2-7-4(e)(9)~~ 2-7-5(13)]

36. The rule cite was changed for conditions D.1.3 and D.4.3, Testing Requirements, as follows:

[326 IAC 2-7-6(1),(6)]

Also, Conditions D.1.3 and D.4.3, have the following language modifications:

~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM~~ **The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.1.1(D.4.1) shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.**

In addition, the Table of Contents was changed also to reflect the rule cite changes.

37. Condition D.1.4, Particulate Matter, was modified to read:

The baghouse dust collectors for PM control shall be in operation at all times when the woodworking equipment is in operation ~~and exhausting to the outside atmosphere.~~

38. Condition D.1.5(a), Visible Emissions Notations, was modified to:

Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

39. Condition D.1.7, parts (a) and (b), under Broken Bag or Failure Detection, have been changed to:

**D.1.7 Broken or Failed Bag or Failure Detection**

---

In the event that bag failure has been observed:

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

40. Under condition D.1.8, Record Keeping Requirements, part (b) has been modified to read:

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain ~~the following records of the results of the inspections required under Condition D.1.6, and the dates the vents are redirected.~~

- ~~(1) Daily records of the following operational parameters during normal operation:~~
- ~~(A) Inlet and outlet differential static pressure; and~~
- ~~(2) Documentation of all response steps implemented, per event.~~
- ~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
- ~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~
- ~~(5) Operator standard operating procedures (SOP).~~
- ~~(6) Manufacturer's specifications or its equivalent.~~

(7) ~~Equipment "troubleshooting" contingency plan.~~

41. In Section D.3, the rule has been changed because the draft permit and TSD listed an incorrect rule as applicable to the source. Since the source is located in Clark County, 326 IAC 6-1 applies rather than 326 IAC 6-3. Therefore, Condition D.3.1 has been modified to read as follows:

D.3.1 Particulate Matter (PM) [326 IAC ~~6-3-2(e)~~ 6-1-2]

Pursuant to 326 IAC ~~6-3-2(e)~~ (Process Operations) **6-1-2 (Particulate Emission Limitations)**, the allowable particulate matter (PM) emission rate from the surface coating operations shall not exceed the pound per hour emission rate established as E in the following formula: **0.03 grain per dry standard cubic foot (dscf)**.

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

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

Also, the Table of Contents rule cite for this condition has been changed as well.

42. A new condition, listed as D.3.4, has been added to Section D.3. It reads as follows:

D.3.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

All subsequent conditions in this section have been renumbered as a result, and the Table of Contents has also been changed.

43. Under the Wood Furniture NESHAP [40 CFR 63, Subpart JJ] in condition D.3.4, now D.3.5, the last sentence in (b)(1)(B) is changed as follows:

~~Solvent and All other~~ **All other** thinners mixtures used for other purposes have a 10.0 percent maximum VHAP content by weight; or

44. Condition D.3.8, now D.3.9, Testing Requirements, reads as follows:

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

~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM, VOC and HAP limit specified in Condition D.3.1, D.3.3, and D.3.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6, and 40 CFR 63, Subpart JJ.~~

- (a) **Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.**
- (b) **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Conditions D.3.1, D.3.3 and D.3.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

45. Condition D.3.10, previously Condition D.3.9, Volatile Organic Compounds, has been changed to:
- (a) Compliance with the VOC content and usage limitations contained in Conditions D.3.3 **and D.3.5** shall be determined pursuant to 326 IAC 8-1-4 **(a)(3)** and 326 IAC ~~8-11-6~~ **8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4, ~~and 326 IAC 8-11-6~~. ~~If solvent or other VOC is added to the finishing material before application, the wood furniture coating line shall maintain documentation showing the VOC content of the finishing material as applied in pounds of VOC per pounds of solids.~~
  - (b) ~~The Permittee shall demonstrate continuous compliance by using compliant material, maintaining records that demonstrate the finishing materials are compliant, and submitting a compliance certification with the semiannual report required by 326 IAC 8-11-9.~~
46. Condition D.3.12, Monitoring, parts (a) and (b), have been modified to read:
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the surface coating booth stacks (S01 through S27)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a **noticeable change in an** overspray emission, **or** evidence of overspray emission, ~~or other abnormal emission~~ is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Since the OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above language change has been recorded in the TSD under Compliance Requirements for the surface coating operations.

47. D.3.13(b)(5), under Record Keeping Requirements, has language added and now reads:
- When the averaging compliance method is used, 6** copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- Also, in this condition, part (b) has a condition reference change from D.3.~~4~~ to D.3.5, and part (c) is changed to D.3.8 instead of D.3.~~6~~.
- Part (d) has changed as follows:
- (d) To document compliance with Condition D.3.12, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

48. Condition D.3.14, Reporting Requirements, parts (b) and (c) have been changed and parts (d) and (e) have been added to read as follows:

- (b) An Initial Compliance status Report to document compliance with Condition D.3. ~~45~~, and the Certification form, shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ within sixty (60) days following the compliance date of November 21, 1997. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.3. ~~45 and the Certification form~~, shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms at the end of this permit or their equivalent,~~ within thirty (30) days after the end of the six (6) months being reported.

**For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:**

- (1) ~~December 1 through May 31~~ **November 21, 1997 through May 20, 1998.**
- (2) ~~June 1 through November 30~~ **May 21 through November 30, 1998.**
- (3) **December 1 through December 31, 1998.**

**For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.**

- (d) **Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.**
- (e) **The reports required in (b), (c) and (d) of this condition shall be submitted to:**

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

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**

49. In Section D.4, the rule has been changed because the draft permit and TSD listed an incorrect rule as applicable to the source. Since the source is located in Clark County, 326 IAC 6-1 applies rather than 326 IAC 6-3. Therefore, Condition D.4.1 has been modified to read as follows:

D.4.1 Particulate Matter (PM) [326 IAC ~~6-3-2(e)~~ 6-1-2]

Pursuant to 326 IAC ~~6-3-2(e)~~ ~~(Process Operations)~~ **6-1-2 (Particulate Emission Limitations)**, the allowable particulate matter (PM) emission rate from the brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed ~~the pound per hour emission rate established as E in the following formula:~~ **0.03 grain per dry standard cubic foot (dscf).**

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

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

Also, the Table of Contents rule cite for this condition has been changed as well.

50. In condition D.4.4, regarding 326 IAC 8-9, the rule does not specifically require recordkeeping of the vapor pressure of the tanks listed in this section. Therefore, this requirement was removed from condition D.4.4, and in condition D.2.2. As a result, conditions D.4.4 and D.2.2, Record Keeping Requirements, parts (a) read as follows:

(a) To document compliance with Condition D.4.2 (D.2.2), the Permittee shall maintain records at the facility showing the following:

- (1) The vessel identification number;
- (2) The dimension of the storage vessel; **and**
- (3) An analysis showing the capacity of the storage vessel; ~~and.~~
- ~~(4) The true vapor pressure of the VOC stored.~~

51. The record reporting in Sections D.4 and D.2 should not be an annual requirement, and as a result, they have been changed as shown below. Condition D.2.3, Reporting Requirements, has been changed to read:

~~An annual~~ **An initial** report to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the **issuance of this permit, and thereafter, within thirty (30) days upon any changes made to these units** ~~end of the year being reported.~~

A new condition, **D.4.5, Reporting Requirements**, has been added to Section D.4, and reads as above, but with a reference to Condition D.4.2.

Because Condition D.4.5 was added, Condition 4.2, Volatile Organic Liquid Storage Vessels, needs additional language added as shown below to further clarify the requirements for these units:

Pursuant to 326 IAC 8-9, stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons are subject to the record keeping **and reporting** requirements set out in Conditions D.4.4 **and D.4.5**.

52. The reporting forms also have changes. The changes are as follows:

The Certification Form has a deletion in the first box of the phrase ~~"Emergency/ Deviation Occurrence Reporting Form"~~.

On the Emergency/ Deviation Occurrence Reporting Form, the last phrase on page 2 of 2, ~~"Attach a signed certification to complete this report,"~~ has been deleted. Also, the fax number has been changed to 317-233-~~6865~~**5967**.

And finally, the Quarterly Compliance Report is now called the "Quarterly Compliance **Monitoring Report**", and the language in the first box has been modified to read as:

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

Also on this form the last column marked "No Deviations" has been deleted. This is now listed in the second box of the form where the phrase **NO DEVIATIONS OCCURRED THIS REPORTING PERIOD** has been added. The third box now has the phrase "**THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**" added, and the phrase "~~LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE~~" has been deleted.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Kitchen Compact, Inc.  
Address City IN Zip: 911 E. 11th Street, Jeffersonville, IN 47130  
County: Clark  
Permit #: T-003-5891  
Plant ID: 003-00007  
Reviewer: Aaron Wiley**

Material	Density (lb/gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/sq ft)	Maximum (sq ft/hour)	Maximum (gal/hour)	Lb VOC / Lb Solids
Topcoat	7.60	59.61%	0.0%	59.6%	0.0%	33.38%	0.49	1000	490.00	1.48
Sealer	7.68	63.25%	0.0%	63.3%	0.0%	28.65%	0.49	1000	490.00	1.72
Wiping Stain	6.60	94.48%	0.58%	93.9%	0.46%	3.76%	0.49	1000	490.00	17.01
Case Stain	6.56	97.05%	0.61%	96.4%	0.48%	1.79%	0.49	1000	490.00	32.69
Stain	6.80	94.72%	0.0%	94.7%	0.0%	3.31%	0.49	1000	490.00	17.94

**Total** 490.00

Material	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Controlled Particulate Potential tons/yr	lb VOC /gal solids	PM Control Efficiency	Transfer Efficiency
Topcoat	4.53	4.53	2219.88	53277.03	9723.06	1647.02	82.35	13.57	95%	75%
Sealer	4.86	4.86	2380.22	57125.38	10425.38	1514.36	75.72	16.95	95%	75%
Wiping Stain	6.20	6.23	3036.73	72881.42	13300.86	195.48	9.77	164.82	95%	75%
Case Stain	6.33	6.36	3099.97	74399.22	13577.86	103.83	5.19	353.43	95%	75%
Stain	6.44	6.44	3156.07	75745.69	13823.59	192.64	9.63	194.59	95%	75%

	VOC	PM10	PM10
<b>Use the worst case coating for each case</b>	<b>TOTAL</b>	<b>13823.59</b>	<b>1647.02</b>
		<b>82.35</b>	

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hr) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
lb VOC/lb solids = Weight % organics/ (1-Weight % volatile)  
Total Emissions = Sum of all numbers  
Total = Sum of all Gallons of material (gal/unit)  
Weighted Average - pounds VOC per gallon = sum of [ gallons of material (gal / hr) \* Pounds of VOC per gallon of coating less water]/total (gal/hr)

Company Kitchen Kompact, Inc.  
Plant Loc911 E. 11th Street, Jeffersonville, IN 47130  
County: Clark  
Permit #: T-003-5891  
Plant ID: 003-00007  
Permit ReAaron Wiley

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hr)	Weight % Methyl Ketone	Weight % Ethyl Toluene	Weight % Ethyl Benzene	Weight % Xylene	Weight % Formaldehyde	Weight % Methyl Alcohol
Topcoat	7.60	0.4899999999999999	1000	5.40%	2.10%	2.70%	13.30%	0.40%	0.00%
Sealer	7.68	0.4899999999999999	1000	12.50%	1.40%	0.00%	3.60%	0.30%	7.00%
Wiping Stain	6.60	0.4899999999999999	1000	0.00%	15.30%	0.00%	2.30%	0.00%	7.10%
Case Stain	6.56	0.4899999999999999	1000	0.00%	15.70%	0.00%	2.40%	0.00%	7.30%
Stain	6.80	0.4899999999999999	1000	23.80%	14.90%	0.00%	0.00%	0.00%	4.90%

Material	Density (lb/gal)	Gal of Mat (gal/hr)	Methyl Et Ketone Emission: (tons/yr)	Toluene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Formalde Emission: (tons/yr)	Methyl Alcohol Emissions (tons/yr)	Total Emissions (tons/yr)
Topcoat	7.60	490	881	343	440	2169	65.2	0	3898
Sealer	7.68	490	2060	231	0	593	49.4	1154	4088
Wiping Stain	6.60	490	0	2167	0	326	0.0	1006	3499
Case Stain	6.56	490	0	2210	0	338	0.0	1028	3576
Stain	6.80	490	3473	2175	0	0	0.0	715	6363

Worst Case Single HAP Er 3473 2210 440 2169 65.2 1154

Worst Case Combinatic 6363

**METHODOLOGY**

HAPs emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Woodworking Emissions**

**Company Name: Kitchen Kompact, Inc.  
Address City IN Zip: 911 E. 11th Street, Jeffersonville, IN 47130  
County: Clark  
Permit #: T-003-5891  
Plant ID: 003-00007  
Reviewer: Aaron Wiley**

**Potential Emissions from the Woodworking Process**

	<u>Dust Collector Information</u>			
	Cloth Area	Ratio	Flow - ACFM	Cont Eff
Throughput of Wood: 11900 Lbs/hr				
PM control equipment: Dust Collector - Baghouse	765	11.27	8621.55	99.70%
Grain Loading: 0.00023 grains/acf	765	12.4	9486	99.70%
Air Flow rate: 62167 acfm	1155	7.87	9089.85	99.70%
Control Efficiency: 99.75%	1940	7.73	14996.2	99.90%
	1155	6.25	7218.75	99.70%
	1155	6.36	7345.8	99.70%
	765	7.07	5408.55	99.70%
		Total	62166.7	99.75%
				weighted average

After Control Emissions:

Emissions: (gr/acf)(acf/min)(60 min/hr)(lb/7000 gr) = 0.123 lb/hr  
 (lb/hr)(ton/2000 lb)(8760 hrs/yr) = 0.54 tons/yr

Before Control Emissions:

Emissions: (tons/yr) / (1-control efficiency) = 213.2 tons/yr

**Allowable Emissions From Woodworking**

Wood throughput: (lbs wood/hr)(ton/2000 lb) = 5.95 tons/hr

326 IAC 6-3-2 (Process Operations - Particulate emissions limitations)

$E = 4.10P^{0.67}$       Where E= emissions in lbs/hr  
 P= process weight rate in tons/hr

$E = (4.10)(\text{wood throughput})^{0.67}$   
 = 13.54 lbs/hr  
 = 59.318 tons/yr

Since 0.54 tons per year is less than the allowable emission rate of 59.3 tons per year, the woodworking operations are in compliance with 326 IAC 6-3-2.

HAP - NESHAP  
Wood Furniture

Company Name: Kitchen Kompact, Inc.  
Address City IN Zip: 911 E. 11th Street, Jeffersonville, IN 47130  
County: Clark  
Permit #: T-003-5891  
Plant ID: 003-00007  
Reviewer: Aaron Wiley

Material	Density (lb/gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit) Total	Maximum (unit/hour)	Maximum (gal/hour)
Topcoat	7.60	59.61%	0.0%	59.6%	0.0%	33.38%	0.49	1000	490.00
Sealer	7.68	63.25%	0.0%	63.3%	0.0%	28.65%	0.49	1000	490.00
Wiping Stain	6.60	94.48%	0.58%	93.9%	0.46%	3.76%	0.49	1000	490.00
Case Stain	6.56	97.05%	0.61%	96.4%	0.48%	1.79%	0.49	1000	490.00
Stain	6.80	94.72%	0.0%	94.7%	0.0%	3.31%	0.49	1000	490.00

Add worst case coating to all solvents

Material	Weight % HAPs	Pounds HAPs per gallon Coating	lb HAPs/hr	Pounds Solids per gallon Coating	lbs Solids per hr	lbs HAPs Per lbs Solids		
Topcoat	23.90%	1.82	890.04	3.07	1504.12	0.59		
Sealer	24.80%	1.90	933.27	2.82	1382.98	0.67		
Wiping Stain	24.70%	1.63	798.80	0.36	178.52	4.47		
Case Stain	25.40%	1.67	816.46	0.19	94.82	8.61		
Stain	43.60%	2.96	1452.75	0.36	175.93	8.26		

Weighted Averages

2.00

1.36

1.47

Weighted Average lb HAPs/lb Solids 1.47

At Maximum Usage, assuming even usage across all coatings, the coatings do not meet NESHAP standards. More accurate usage information will be necessary to show actual compliance, or non-compliance.

METHODOLOGY

Total = Sum of all Gallons of material (gal/hr)

Weighted Average (lbs VOC / gallon) = sum of [ gallons of material (gal / hr) \* Pounds of VOC per gallon of coating less water]/total (gal/hr)  
 Weighted Average (lbs HAPs / gallon) = sum of [ gallons of material (gal / hr) \* Pounds of HAPs per gallon of coating less water]/total (gal/hr)  
 Weighted Average (lbs Solids / gallon) = sum of [ gallons of material (gal / hr) \* Pounds of solids per gallon of coating less water]/total (gal/hr)  
 lb HAPs/lb Solids = weighted average HAPs / weighted average lbs Solids per gallon