

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**JOFCO, Inc.
Plant 1, ID037-00009
404-424 East 13th Street
Jasper, Indiana 47547 and**

and

**JOFCO, Inc.
Plant 2, ID037-00024
305 East 12th Street
Jasper, Indiana 47547**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed 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.: T037-5984-00107

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

Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air 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 source manufacturing process for wood office furniture. JOFCO, Inc. Plant 1 has been combined with JOFCO, Inc. Plant 2 as one Title V source. The combined source ID is 037-00107.

Responsible Official: Jerry Olinger
Source Address: Plant 1: 404-424 East 13th Street, Jasper, Indiana 47547
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 1 and Plant 2: PO Box 71, Jasper, Indiana 47547
SIC Code: 2521
County Location: Jasper
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD;
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:

PLANT 1

- (1) Fourteen (14) surface coating booths, identified as SB-1 through SB-14, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30.
- (2) One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with three (3) Carter day baghouses for particulate control, exhausting to stacks DC-1 through DC-3.
- (3) One (1) wood and coal-fired spreader-stoker boiler, identified as B-1, with a maximum capacity of ten million (10,000,000) Btu per hour, with a flyash cyclone collector for particulate control, exhausting to stack BS-1.

PLANT 2

- (1) Twelve (12) surface coaters exhausting to stacks SC-1 through SC-20, with dry filters for particulate control, consisting of the following:
 - (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
 - (b) three (3) spray booths identified as SB-8 through SB-10, constructed in 1988;
 - (c) one (1) spray booth identified as SB-11, constructed in 1991; and
 - (d) one (1) dip tank, constructed in 1988.

- (2) One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with two (20) baghouses for particulate control, exhausting to stacks DC-1 and DC-2.
- (3) One (1) wood and coal-fired spreader-stoker boiler, identified as B-1, with a maximum capacity of ten million (10,000,000) Btu per hour, with a flyash cyclone collector for particulate control, exhausting to stack BS-1.

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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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, then 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
 - (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 Permittee activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-5(3)(c)][326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, 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, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete, unless otherwise provided by this permit.
- (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 July 1 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 failure to implement the plan 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 Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The Permittee facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, 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 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 Plans 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 materials of substantial economic value.

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

B.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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, 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, Indiana 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 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 of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.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)]
- (f) 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]
- (g) 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

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

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, 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 nonoverlapping 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 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)]

- (a) 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.
- (b) 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, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

C.15 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on May 20, 1996.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) 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.16 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.17 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.18 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).

C.19 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 July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The 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 January 1 and ending December 31. 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.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (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.21 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 within a reasonable time 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 within a reasonable time 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 required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance 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.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 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 quarterly 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).

C.23 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.

PLANT #1

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Fourteen (14) surface coating booths, identified as SB-1 through SB-14, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30.

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

D.1.1 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.1.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of or December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:

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

D.1.3 Work Practice Standards [40 CFR 63.803]

The 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.1.4 Particulate Matter (PM) [326 IAC 6-1-2]

The surface coating equipment shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (dscf).

D.1.5 Volatile Organic Compound (VOC)

Any physical change or modification which may increase potential emission from the surface coating operation, shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1), (6)]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) The Permittee is not required to test 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 particulate matter or volatile organic compound limit specified in Condition D.1.2 or D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the fourteen (14) spray booths (SB-1 through SB-14) are in operation.

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

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 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. During periods of inclement weather, these inspections shall be performed as weather permits. 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.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.2.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections or notation of specific weather conditions that prevent monthly roof top inspection, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.1.2 and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
 - (2) July 1 through December 31.
- (c) The reports required in (a) and (b) 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.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with three (3) Carter Day baghouses for particulate control, exhausting to stacks DC-1 through DC-3.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-9]

Pursuant to 326 IAC 6-1-9 (Nonattainment Area Particulate Limitations: Dubois county), particulate matter (PM) emissions from the woodworking facilities shall be limited to 1.2 tons per year.

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

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 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 particulate matter PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

The baghouses, identified as DC-1, DC-2, and DC-3 for PM control shall be in operation at all times when the woodworking is in operation.

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

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

- (1) The baghouse shall be inspected.
- (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

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

D.2.7 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.2.6 are not required, and will be replaced by the following:

- (a) Daily visible emission notations of the three (3) baghouses stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.8 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 to the indoors. All defective bags shall be replaced.

D.2.9 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the baghouses identified as DC-1, DC-2, and DC-3 stack exhaust.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 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.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] One (1) wood and coal-fired spreader-stoker boiler, identified as B-1, rated at ten (10) mmBtu per hour, with a flyash cyclone collector for particulate control, exhausting at one (1) stack, identified as BS-1.

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

D.3.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) when coal is burned, the SO₂ emissions from the ten (10) mmBtu per hour coal-fueled boiler, shall not exceed six and zero-tenths (6.0) pounds per mmBtu for coal combustion.

D.3.2. Particulate Matter (PM) [326 IAC 6-1-9]

Pursuant to 326 IAC 6-1-9 (Nonattainment Area Particulate Limitations) the Particulate Matter emissions from the ten (10) mmBtu per hour boiler, shall be limited to six tenths (0.6) pounds per mmBtu and 23.6 tons per year.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.4 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 particulate matter or sulfur dioxide limit specified in Condition D.3.1 or D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per mmBtu when burning coal. Compliance shall be determined utilizing one of the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:
 - (1) The name of the coal supplier; and
 - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and
 - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
 - (4) The methods used to determine the properties of the coal; or
- (b) Sampling and analyzing the coal using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods:
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least one (1) time per day;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or

- (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.3.6 Visible Emissions Notations

- (a) Daily visible emissions notations of the cyclone stack exhaust shall be performed during normal daylight operations. A trained employee will 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 response steps for when an abnormal emission is observed.

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1 and D.3.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.3.1 and D.3.2.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual coal usage since last compliance determination period; and
 - (3) Sulfur content, heat content, and ash content; and
 - (4) Sulfur dioxide emission rates; and
 - (5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

PLANT #2

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Twelve (12) surface coaters exhausting to stacks SC-1 through SC-20, with dry filters for particulate control, consisting of the following:

- (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
- (b) three (3) spray booths identified as SB-8 through SB-10, constructed in 1988;
- (c) one (1) spray booth identified as SB-11, constructed in 1991; and
- (d) one (1) dip tank, constructed in 1988.

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

D.4.1 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.4.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (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) for existing or eight-tenths (0.8) for new source) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

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

D.4.3 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.4.4 Volatile Organic Compound (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 from spray booth eleven (SB-11) 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) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.4.5 Volatile Organic Compound (VOC)

- (a) Pursuant to Registration Letter, issued on March 1, 1988, volatile organic compound emissions shall be limited to 24 tons per twelve consecutive month period, for the spray booths identified as SB8 through SB10 and one dip tank.
- (b) Any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from spray booths, identified as SB8 through SB10 and one dip tank, must be approved by the Office of Air Management (OAM) before such change may occur.

D.4.6 Volatile Organic Compound (VOC)

Any change or modification which may increase potential emission from SB-1 through SB-7 shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.

D.4.7 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT) the surface coating operation shall reduce VOC emissions using best available control technology. Compliance with BACT shall be satisfied through compliance with 326 IAC 8-2-12 and 40 CFR 63, Subpart JJ.

Pursuant to 326 IAC 8-1-6, the seven (7) surface coating booths identified as SB-1 through SB-7

- (a) 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.

- (b) 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.4.8 Particulate Matter (PM) [326 IAC 6-1-2]

The surface coating equipment shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (dscf).

D.4.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.4.10 Testing Requirements [326 IAC 2-7-6(1), (6)]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) The Permittee is not required to test 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 particulate matter or volatile organic compound limits specified in Condition D.4.2, D.4.5, or D.4.7 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.2 and D.4.5 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.

D.4.12 VOC Emissions

Compliance with Condition D.4.5 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

D.4.13 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the eleven (11) spray booths (SB-1 through SB-11) are in operation.

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

D.4.14 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 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. During periods of inclement weather, these inspections shall be performed as weather permits. 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.4.15 Record Keeping Requirements

- (a) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.2.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The 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) Copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) To document compliance with Conditions D.4.5 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) 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.4.5.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with condition D.4.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections or notation of specific weather conditions that prevent monthly roof top inspection, 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.4.16 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.4.2 and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.4.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (c) The reports required in (a) and (b) 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

- (d) A quarterly summary of the information to document compliance with Condition D.4.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with two (2) baghouses for particulate control, exhausting to stacks DC-1 and DC-2.
--

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

D.5.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to OP19-01-90-0264 and 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Dubois county), particulate matter (PM) emissions from the woodworking facilities shall be limited to 0.03 grains per dry standard cubic foot and 5.0 tons per year total emissions.

D.5.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

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

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.5.4 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 particulate matter (PM) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.5 Particulate Matter (PM)

The baghouses, identified as DC-1 and DC-2 for PM control shall be in operation at all times when the woodworking is in operation.

D.5.6 Visible Emissions [326 IAC 2-7-1(21)(G)(xxix)]

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

- (1) The baghouse shall be inspected.
- (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

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

D.5.7 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.5.6 are not required, and will be replaced by the following:

- (a) Daily visible emission notations of the two (2) baghouses stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.8 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 to the indoors. All defective bags shall be replaced.

D.5.9 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.10 Record Keeping Requirements

- (a) To document compliance with Condition D.5.7, the Permittee shall maintain records of daily visible emission notations of the baghouses identified as DC-1 and DC-2 stack exhaust.
- (b) To document compliance with Condition D.5.8, the Permittee shall maintain records of the results of the inspections required under Condition D.5.8 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.6 FACILITY OPERATION CONDITIONS

One (1) wood and coal-fired spreader-stoker boiler, identified as B-1, rated at ten (10) mmBtu per hour, with a flyash cyclone collector for particulate control, exhausting at one (1) stack, identified as BS-1.

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

D.6.1. Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations) the Particulate Matter emissions from the ten (10) mmBtu per hour boiler, shall be limited to six tenths (0.6) pounds per mmBtu.

D.6.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) when coal is burned, the SO₂ emissions from the ten (10) mmBtu per hour coal-fueled boiler, shall not exceed six and zero-tenths (6.0) pounds per mmBtu for coal combustion.

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.6.4 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 particulate matter PM and sulfur dioxide SO₂ limit specified in Condition D.6.1 and D.6.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per mmBtu when burning coal. Compliance shall be determined utilizing one of the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:
 - (1) The name of the coal supplier; and
 - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and
 - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
 - (4) The methods used to determine the properties of the coal; or
- (b) Sampling and analyzing the coal using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods:
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least one (1) times per day;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.6.6 Visible Emissions Notations

- (a) Daily visible emissions notations of the cyclone stack exhaust shall be performed during normal daylight operations. A trained employee will 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 response steps for when an abnormal emission is observed.

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

D.6.7 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.6.1 and D.6.2.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual coal usage since last compliance determination period; and
 - (3) Sulfur content, heat content, and ash content; and
 - (4) Sulfur dioxide emission rates; and
 - (5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: JOFCO, Inc. Plant 1 and Plant 2
Source Address: Plant 1: 404-424 East 13th Street, Jasper, Indiana 47547
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 1 and 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

Source Name: JOFCO, Inc. Plant 1 and Plant 2
Source Address: Plant 1: 404-424 East 13th Street, Jasper, Indiana 47547
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 1 and 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input type="checkbox"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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• 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
<input type="checkbox"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <ul style="list-style-type: none">• 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

Page 2 of 2

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 ₂ , VOC, NO _x , 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
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: JOFCO, Inc. Plant 1 and Plant 2
Source Address: Plant 1: 404-424 East 13th Street, Jasper, Indiana 47547
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 1 and 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107

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 compliance 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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: JOFCO, Inc. Plant 2
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107
Facility: Plant 2: Spray Booths SB-8 through SB-10 and one dip tank
Parameter: VOC usage
Limit: 24 tons per 12 consecutive month period

YEAR: _____

Month and Year	VOC usage (tons/ month)
Month 1	
Month 2	
Month 3	

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

PART 70 OPERATING PERMIT Semi-Annual Report VOC and VHAP usage - Wood Furniture NESHAP

Source Name: JOFCO, Inc. Plant 1
 Source Address: Plant 1: 404-424 East 13th Street, Jasper, Indiana 47547
 Mailing Address: Plant 1: PO Box 71, Jasper, Indiana 47547
 Part 70 Permit No.: T037-5984-00107
 Facility: Surface Coating
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

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

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

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

**PART 70 OPERATING PERMIT
 Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: JOFCO, Inc. Plant 2
 Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
 Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
 Part 70 Permit No.: T037-5984-00107
 Facility: Surface Coating
 Parameter: VOC and VHAPs - NESHAP
 Limit:
 (1) Finishing operations -1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

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

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

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Title V Quarterly Report

Source Name: JOFCO, Inc. Plant 1
 Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
 Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
 Part 70 Permit No.: T037-5984-00107
 Facility: One (1) ten (10) mmBtu per hour, wood and coal-fired spreader-stoker boiler, identified as B-1
 Parameter: Sulfur Dioxide (SO₂)
 Limit: 6.0 pounds per million Btu heat input

Months: _____ Year: _____

Month	Monthly Average Coal Sulfur Content (%)	Monthly Average Heat Content (MMBtu/lb)	Coal Consumption (Tons)	Equivalent Sulfur Dioxide Emissions (lb/MMBTU)

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

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

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Title V Quarterly Report

Source Name: JOFCO, Inc. Plant 2
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107
Facility: One (1) ten (10) mmBtu per hour, wood and coal-fired spreader-stoker boiler, identified as B-1
Parameter: Sulfur Dioxide (SO₂)
Limit: 6.0 pounds per million Btu heat input

Months: _____ Year: _____

Month	Monthly Average Coal Sulfur Content (%)	Monthly Average Heat Content (MMBtu/lb)	Coal Consumption (Tons)	Equivalent Sulfur Dioxide Emissions (lb/MMBTU)

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

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

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name:	JOFCO, Inc.
Source Location:	Plant 1: 404-424 East 13th Street Jasper, Indiana 47547, Plt ID 037-00009
Source Location:	Plant 2: 305 East 12th Street Jasper, Indiana 47547, Plt ID 037-00024
County:	Spencer
SIC Code:	2521
Operation Permit No.:	T037-5984-00107
Permit Reviewer:	Monica Dick

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Kimball International, Inc. relating to the operation of wood office furniture products manufacturing.

Source Definition

JOFCO, Inc. Plant 1 and JOFCO, Inc. Plant 2 were determined to be one source on July 1, 1998. Both plants are under common control or common ownership, both have identical two digit SIC codes. JOFCO, Inc. Plant 1 and Plant 2 are located within 3 miles from one another, and an estimated 25% of the products manufactured rely on both plants to finish the job.

This wood office furniture manufacturing company consists of two (2) plants:

- (1) Plant 1 is located at 404-424 East 13th Street, Jasper, Indiana; and
- (2) Plant 2 is located at 305 East 12th Street, Jasper, Indiana.

The combined source ID number is 037-000107

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Plant 1:

- (1) Fourteen (14) surface coating booths, identified as SB-1 through SB-14, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30.
- (2) One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with three (3) Carter day baghouses for particulate control, exhausting to stacks DC-1 through DC-3.
- (3) One (1) wood and coal-fired spreader-stoker boiler, identified as B-1, with a maximum capacity of ten million (10,000,000) Btu per hour, with a flyash cyclone collector for particulate control, exhausting to stack BS-1.

Plant 2:

- (1) Twelve (12) surface coaters exhausting to stacks SC-1 through SC-20, with dry filters for particulate control, consisting of the following:
 - (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
 - (b) three (3) spray booths identified as SB-8 through SB-10, constructed in;
 - (c) one (1) spray booth identified as SB-11, constructed in; and
 - (d) one (1) dip tank.
- (2) One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with two (2) baghouses for particulate control, exhausting to stacks DC-1 and DC-2.
- (3) One (1) wood and coal-fired spreader-stoker boiler, identified as B-1, with a maximum capacity of ten million (10,000,000) Btu per hour, with a flyash cyclone collector for particulate control, exhausting to stack BS-1.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

New Emission Units and Pollution Control Equipment Requiring ENSR

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

Insignificant Activities

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

Plant 1:

- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (5) Closed loop heating and cooling systems.
- (6) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

- (7) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.
- (8) Paved and unpaved roads and parking lots with public access.
- (9) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling towers.
- (10) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (11) Other categories with emissions below insignificant threshold:
 - (a) Storage tanks with VOC emissions less than three (30 pounds per hour or fifteen (15) pounds per day. (One (1) 3,000 gallon draw dip above ground storage tank, one (1) 3,000 gallon sealer aboveground storage tank, and one (1) 3,000 gallon to coat aboveground storage tank
 - (b) Water-based gluing operations with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day. (Two 92) glue presses and one (1) glue spray booth).

Existing Approvals

Plant 1:

The plant has been operating under the following approvals:

- (1) OP 19-01-90-0261, issued on March 18, 1986.
- (2) OP 19-01-90-0262, issued on March 18, 1986.
- (3) OP 19-01-90-0263, issued on March 18, 1986.

Plant 2:

The plant has been operating under the following approvals:

- (1) OP19-01-90-0264, issued on March 18, 1986
- (2) OP 19-01-90-0265, issued on March 18, 1986.
- (3) OP037-1982-00024, issued on June 27, 1991
- (4) Registration, issued on March 1, 1988.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

OP19-01-90-0263, issued on March 18, 1986 for JOFCO Plant 1, Condition 5: that particulate matter emissions from the woodworking process shall be limited to: 0.03 grains per dry standard cubic foot and 27.4 pounds per hour.

Reason not incorporated: Jasper Office furniture 037-00009 is specifically listed in 326 IAC 6-1-9 as having a PM limit of 1.2 tons per year. There is no grain loading limit specified under 326 IAC 6-1-9.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996.

A notice of completeness letter was mailed to the source on February 17, 1998.

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.”

Plant 1

Plant 2

Pollutant	Potential Emissions (tons/year)	Pollutant	Potential Emissions (tons/year)	TOTAL: Potential Emissions (tons/year)
PM	greater than 250	PM	greater than 250	greater than 250
PM-10	greater than 250	PM-10	less than 250	greater than 250
SO ₂	less than 250	SO ₂	less than 250	less than 250
VOC	greater than 250	VOC	greater than 250	greater than 250
CO	less than 250	CO	less than 250	less than 250
NO _x	less than 250	NO _x	greater than 250	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Actual Emissions (tons/year)	HAP's	Actual Emissions (tons/year)	TOTAL: Actual Emissions (tons/year)
single HAP	greater than 10	single HAP	greater than 10	greater than 10
TOTAL	greater than 25	TOTAL	greater than 25	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) 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 are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

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

Plant 1		Plant 2		
Pollutant	Actual Emissions (tons/year)	Pollutant	Actual Emissions (tons/year)	TOTAL: Actual Emissions (tons/year)
PM	4.06	PM	0.55	4.61
PM-10	0.00	PM-10	0.12	0.12
SO ₂	14.62	SO ₂	4.20	18.82
VOC	32.66	VOC	110.22	142.88
CO	3.69	CO	1.16	4.85
NO _x	5.53	NO _x	1.65	7.18

HAP's	Actual Emissions (tons/year)	HAP's	Actual Emissions (tons/year)	TOTAL: Actual Emissions (tons/year)
formaldehyde	0.61	formaldehyde	0.18	0.79
methanol	0.00	methanol	27.79	27.79
methyl ethyl ketone	1.91	methyl ethyl ketone	6.16	8.07
methyl isobutyl ketone	0.00	methyl isobutyl ketone	0.37	0.37
methylene chloride	0.36	methylene chloride	0.54	0.90
toluene	1.92	toluene	6.83	8.75
vinyl acetate	0.01	vinyl acetate	0.00	0.01
xylene	0.65	xylene	3.12	3.77
chromium compounds	0.02	chromium compounds	0.00	0.02
TOTAL	5.48	TOTAL	44.99	50.47

Limited Potential to Emit

The table below summarize the total limited potential to emit of the significant emission units.

Plant 1	Limited Potential to Emit						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating:				greater than 250t/yr			
Woodworking:	1.2t/yr						
Wood and coal fired boiler	23.6t/yr & 0.6#/mmBtu						

Plant 2:

Process/ facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating: SB1 - SB7 SB-8 - SB-10 & one dip tank				greater than 250t/y less than 25 tons/ 12 consecutive month period			
Woodworking:	0.03 g/dscf and 5.0 t/yr						
Wood and coal fired boiler	0.6#/mmBtu						

County Attainment Status

The source is located in Spencer County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Spencer County has been designated as attainment or unclassifiable 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:

- (1) 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.
- (2) 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

40 CFR 60.4, Subpart Dc

The wood-fired boilers with coal as a back-up fuel is not subject to the requirements of the New source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc), because the date of construction (1964 for Plant 1 and 1977 for Plant 2) was before June 9, 1989.

40 CFR 63, Subpart T

The parts washing station is not subject to the requirements of the National emission Standards for Hazardous Air pollutants (NESHAPs), Subpart T, because the solvent used does not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform and the operation does not involve heating or boiling the solvent and no mechanical devices are used to move or convey parts through the solvent.

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 December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).

- (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) 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 the operation.
- (5) A semi-annual summary report shall be prepared and submitted to IDEM, OAM to document the ongoing compliance status of the wood furniture coating.

State Rule Applicability - Entire Source

Major Source

Pursuant to 326 IAC (Prevention of Significant Deterioration) and 40 CFR 52.21, this source has the potential to emit more than 250 tons per year, it is a major source.

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 particulate matter, volatile organic compounds (VOCs), and sulfur dioxide. 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 July 1 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 5-1 (Opacity Limitations: Dubois County)

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

- (a) Visible emissions shall not exceed an average of forty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4;
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

Plant 1:

State Rule Applicability - Surface Coating Operations

Particulate Matter (PM) [326 IAC 6-1-2]

The surface coating equipment shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (dscf)

Since dry filters are used for particulate control the surface coating operation is in compliance with 326 IAC 6-1-2.

326 IAC 8

Rule 8 applies to the surface coating operation identified as SB 1 through SB14. However, there are no applicable limits since this is an existing source that was constructed prior to October 7, 1974, it is located in Dubois County, and they are coating wood furniture.

State Rule Applicability - Wood Working Operation

Particulate Matter (PM) [326 IAC 6-1-9]

Pursuant to 326 IAC 6-1-9 (Nonattainment Area Particulate Limitations: Dubois county), particulate matter (PM) emissions from the woodworking facilities shall be limited to 1.2 tons per year. Since the PM emissions after controls are less than the allowable the woodworking operation is in compliance with 326 IAC 6-1-9.

State Rule Applicability - Wood and Coal Fired Boilers

SO₂ Emissions Limitations

Pursuant to 326 IAC 7-1.1 when coal is burned, the SO₂ emissions from the ten (10) mmBtu per hour coal-fueled boiler, shall not exceed six and zero-tenths 96.00 pounds per mmBtu for coal combustion. Since the SO₂ emissions are less than the allowable, the wood and coal fired boiler is in compliance with 326 IAC 7-1.1.

Allowable SO₂ emissions when burning coal =
 $6.0\text{lbs/mmBtu} \times 10.0\text{ mmBtu/hr} = 60\text{lbs/hr} = 60\text{lbs/hr}$

Potential SO₂ emissions when burning coal = $58.5\text{t/y} \times 2000\text{lbs/ton} \times \text{yr}/8760\text{hrs} = 13.36\text{lbs/hr}$

Particulate Matter (PM) [326 IAC 6-1-9]

Pursuant to 326 IAC 6-1-9 (Nonattainment Area Particulate Limitations) the Particulate Matter emissions from the ten (10) mmBtu per hour boiler, shall be limited to six tenths (0.6) pounds per million Btu and 23.6 tons per year. Since the PM emissions after controls (flyash cyclone collector) are less than the allowable the wood and coal fired boiler is in compliance with 326 IAC 6-1-9.

Allowable PM emissions when burning wood = $0.6\text{lbs/mmBtu} \times 10.0\text{ mmBtu/hr} = 6.0\text{ lbs/hr}$

Potential PM emissions when burning wood emissions after controls =
 $3.85\text{t/yr} \times 2000\text{lbs/ton} \times \text{yr}/8760\text{hrs} = 0.88\text{lbs/hr}$

Allowable PM emissions when burning coal = $0.6\text{lbs/mmBtu} \times 10.0\text{ mmBtu/hr} = 6.0\text{ lbs/hr}$

Potential PM emissions when burning coal (after controls) =

$111.2\text{t/yr} \times (1-.85)\text{flyash collector efficiency} = 16.68\text{t/yr}$

$16.68\text{t/yr} \times 2000\text{lbs/ton} \times \text{yr}/8760\text{hrs} = 3.81\text{lbs/hr}$

State Rule Applicability - Degreasing

Degreasing Operation

The degreasing operation at JOFCO Plant 2 was installed prior to January 1, 1980 and this source is located in Dubois County. Therefore, there are no conditions from 326 IAC 8-3 that apply.

State Rule Applicability - Storage Tanks

Storage Tanks

This facility is located in Dubois County. Therefore, Rule 326 IAC 8-9-1 does not have any applicable limits that apply.

PLANT 2:

State Rule Applicability - Surface Coating Operations

Particulate Matter (PM) [326 IAC 6-1-2]

The surface coating equipment shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (dscf)

Since dry filters are used as a particulate matter control the spray coating operation is in compliance with 326 IAC 6-1-2.

Volatile Organic Compound (VOC)

- (a) Pursuant to Registration Letter, issued on March 1, 1988, volatile organic compound emissions shall be limited to 24 tons per twelve consecutive month period, for the spray booths identified as SB8 through SB10 and one dip tank. Therefore, the requirements of 326 IAC 8-1-6(BACT) will not apply.
- (b) Any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from spray booths, identified as SB8 through SB10 and one dip tank, must be approved by the Office of Air Management (OAM) before such change may occur.

Volatile Organic Compound (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 from spray booth identified as SB-11, constructed in 1991 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) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 8-6-1 (VOC)

Does not apply because the source was constructed after January 1, 1980.

326 IAC 8-1-6 (BACT)

Surface coating operation is subject to BACT because the facility was constructed after January 1, 1980, it has the ability to emit greater than 25 tons per year of VOCs, and it is not otherwise regulated by other provisions of article 8. Compliance with BACT is satisfied through compliance with 326 IAC 8-2-12 and 40 CFR 63, Subpart JJ.

Pursuant to 326 IAC 8-1-6, the seven (7) surface coating booths identified as SB-1 through SB-7

- (a) 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.

- (b) 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.

State Rule Applicability - Wood Working Operation

Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to OP19-01-90-0264 and 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Dubois county), particulate matter (PM) emissions from the woodworking facilities shall be limited to 0.03 grains per dry standard cubic foot and 5.0 tons per year total emissions.

Since, the PM emissions after controls are less than the allowable PM emissions, the woodworking is in compliance with 326 IAC 6-1-2.

State Rule Applicability - Wood and Coal Fired Boilers

SO2 Emissions Limitations

Pursuant to 326 IAC 7-1.1 when coal is burned, the SO2 emissions from the ten (10) mmBtu per hour coal-fueled boiler, shall not exceed six and zero-tenths (6.0) pounds per mmBtu for coal combustion. Since the SO2 emissions are less than the allowable, the wood and coal fired boiler is in compliance with 326 IAC 7-1.1.

Allowable SO2 emissions when burning coal =
 $6.0\text{lbs/mmBtu} \times 10.0\text{ mmBtu/hr} = 60\text{lbs/hr} = 60\text{lbs/hr}$
Potential SO2 emissions when burning coal = $0.58.5\text{t/y} \times 2000\text{lbs/ton} \times \text{yr}/8760\text{hrs} = 13.36\text{lbs/hr}$

Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Particulate Limitations) the Particulate Matter emissions from the ten (10) mmBtu per hour boiler, shall be limited to six tenths (0.6) pounds per million Btu. Since the PM emissions after controls are less than the allowable the wood and coal fired boiler is in compliance with 326 IAC 6-1-2.

Allowable PM emissions when burning wood = $0.6\text{lbs/mmBtu} \times 10.0\text{ mmBtu/hr} = 6.0\text{ lbs/hr}$
Potential PM emissions when burning wood emissions after controls =
 $3.85\text{t/yr} \times 2000\text{lbs/ton} \times \text{yr}/8760\text{hrs} = 0.88\text{lbs/hr}$

Allowable PM emissions when burning coal = $0.6\text{lbs/mmBtu} \times 10.0\text{ mmBtu/hr} = 6.0\text{ lbs/hr}$
Potential PM emissions when burning coal (after controls) =
 $111.2\text{t/yr} \times (1-.85)\text{flyash collector efficiency} \times 2000\text{lbs/ton} \times \text{yr}/8760\text{hrs} = 3.81\text{lbs/hr}$

State Rule Applicability - Degreasing

Degreasing Operation

The degreasing operation at JOFCO Plant 2 was installed prior to January 1, 1980 and this source is located in Dubois County. Therefore, there are no conditions from 326 IAC 8-3 that apply.

State Rule Applicability - Storage Tanks

Storage Tanks

This facility is located in Dubois County. Therefore, Rule 326 IAC 8-9-1 does not have any applicable limits that apply.

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.

PLANT 1:

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

- (1) The surface coaters have compliance monitoring conditions as specified below:
 - (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 observations shall be made of the overspray from the surface coating booth stacks 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.
 - (a) 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 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.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-1-2.

- (2) The woodworking facility has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the wood working facility shall be performed during normal daylight operations when exhausting to the atmosphere. 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) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
 - (ii) 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.

The baghouses for the woodworking operation must operate properly to ensure compliance with 326 IAC 6-1-9 (Particulate Limitations; Dubois County) and 326 IAC 2-7 (Part 70).

- (3) The ten (10) mmBtu per hour boiler has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the boiler exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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 start up or shut down time. In the case of batch or discontinuous operations, reading 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 sulfur content, heat content and ash percentage must be monitored and recorded on a monthly basis. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-2 and 326 IAC 7-2.

These monitoring conditions are necessary because the cyclone for the boiler must operate properly to ensure compliance with 326 IAC 6-1-9 (Particulate Limitations; Dubois County), 326 IAC 2-7 (Part 70), and 326 IAC 7-1 (Sulfur dioxide emissions limitations).

PLANT 2:

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

- (1) The two (2) surface coaters have compliance monitoring conditions as specified below:
 - (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 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.
 - (a) 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 noticeable change in 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.

These monitoring conditions are necessary because the dry filters for the surface coating operation must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Limitations) and 326 IAC 2-7 (Part 70).

- (2) The wood working facility has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the wood working facility shall be performed during normal daylight operations when exhausting to the atmosphere. 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) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.
 - (c) In the event that bag failure has been observed:

- (i) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (ii) 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.

The baghouses for the woodworking operation must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Limitations) and 326 IAC 2-7 (Part 70).

- (3) The ten (10) mmBtu per hour boiler has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the boiler exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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 start up or shut down time. In the case of batch or discontinuous operations, reading 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 sulfur content, heat content and ash percentage must be monitored and recorded on a monthly basis. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-2 and 326 IAC 7-2.

These monitoring conditions are necessary because the cyclone for the boiler must operate properly to ensure compliance with 326 IAC 6-1-9 (Particulate Limitations: Dubois County), 326 IAC 2-7 (Part 70), and 326 IAC 7-1 (Sulfur dioxide emissions limitations).

Air Toxic 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 used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

Conclusion

The operation of this wood furniture manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T037-5984-00009.

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

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

Source Name: JOFCO, Inc.
Source Location: Plant 1: 404-424 East 13th Street
Jasper, Indiana 47547, Plt ID 037-00009
Source Location: Plant 2: 305 East 12th Street
Jasper, Indiana 47547, Plt ID 037-00024
County: Dubois
SIC Code: 2521
Operation Permit No.: T037-5984-00107
Permit Reviewer: Monica Dick

On July 22, 1998, the Office of Air Management (OAM) had a notice published in the Jasper Public Library, 1116 Main Street, Jasper, Indiana, 47546 stating that JOFCO, Inc. Plant 1 and Plant 2 had applied for a Part 70 Operating Permit to operate a wood office furniture manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public should 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.

The following comments were submitted on the TSD

The TSD will remain as it originally appeared when published. 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 permit has been published 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.

Comment 1:

Page 1 and 6 of the TSD says we are in Spencer County. We are in Dubois.

Response 1:

The TSD should have read Dubois County.

Comment 2:

Page 1 says "Part 70 permit application from Kimball International, Inc."

Response 2:

The TSD should have read Part 70 permit application from JOFCO, Inc.

Comment 3:

Page 8 of the TSD says "forty percent (30%) opacity" at the bottom of the page.

Response 3:

The TSD should have read "thirty percent (30%) opacity" at the bottom of the page.

Comment 4:

Page 9 of the TSD under SO₂ Emissions Limitations says "six and zero-tenths 96.00 pounds per mmBtu".

Response 4:

The TSD should have read six and zero-tenths (6.0) pounds per mmBtu.

The following comments were submitted on the draft PERMIT

Comment 5:

On page 21 of the draft permit, what constitutes a "demolition project"?

Response 5:

Demolition project is defined pursuant to 40 CFR 61.140 as "the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of an facility." Condition C.9 also states that an Indiana Accredited Asbestos Inspector "thoroughly inspect the affected portions of the facility for the presence of asbestos" prior to a renovation. Renovation is defined pursuant to 40 CFR 61.140 as "altering a facility or one or more facility components in any way, including the stripping or removal or RACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions."

Comment 6:

JOFCO submitted a Emergency Reduction Plan on May 20th 1996. Do we need something else?

Response 6:

The Title V permit has been modified to reflect the submittal of the Emergency Reduction Plan. The changes are as follows:

C.15 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]~~
- (a) **The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on May 20, 1996.**
- (b) **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.**
- (c) **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.**
- (d) **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.**
- (e) **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]**

Comment 7:

B.10 Certification - We request that the statement, "unless specifically indicated by this permit" be added to the first sentence. "Any application form, report, or compliance certification submitted under this permit shall contain certification by responsible official of truth, accuracy, and completeness."

Response 7:

Although the language in Condition B.10(a) comes directly from 326 IAC 2-7-4(f), IDEM, OAM understands there may be some confusion of when a certification is required. Therefore, the condition will be changed to clarify when a certification is required. Condition B.10(a) has been changed as follows:

B.10 Certification **[326 IAC 2-7-5(3)(c)]**~~[326 IAC 2-7-4(f)]~~ ~~[326 IAC 2-7-6(1)]~~

- (a) **Where specifically designated by this permit or required by an applicable requirement, 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.**

Comment 8:

Condition B.11 Annual Compliance Certification - The permit language has changed since the initial draft from reporting any insignificant activity that has been added without a permit revision to any significant activity that has been added without a permit revision. Our understanding of the annual certification was that we would provide notification of any new insignificant activities. The addition of any significant activities without a permit revision is already covered by the general articles and would be repetitious to specifically include here. Therefore, we request that "significant" be changed back to "insignificant".

Response 8:

The published Title V refers to insignificant activity in B.11(c)(5). The Permit will remain as it was when published.

Comment 9:

B.14 Permit Shield - The permit language stating that this permit will supersede all previous permits has been removed from this condition. This implies that we are now responsible for the conditions included in this and all previous permits. This will create an impractical environment for managing compliance at our facility. We respectfully request that permit language stating that this permit will supersede all previous permits be returned to the permit and that the permit alone list our compliance requirements. If this is not possible, we respectfully request that the following operation conditions from operation permits be specifically referenced as no longer valid. These conditions have been duplicated or replaced by conditions in the draft Title V permit.

- a. Overspray is not detectable at exhaust
- b. Overspray will not accumulate on roof and ground
- c. Overspray is not causing any nuisance

Response 9:

This condition is almost exactly the wording required by 326 IAC 2-7-15. 40 CFR 70.6(f) states that the permitting authority may expressly include in a Part 70 permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements. OAM believe non-applicable requirement determinations should be dealt with in Section D. OAM has also added language dealing with applicable requirements from prior permits. On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superseded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However, the OAM also believes that the Permit Shield condition B.14 (b) (1) and (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all previous permits identified by the source and the OAM during the course of this review.

IDEM has determined that the current condition language does not reflect the true intent of the condition. Therefore, additional language will be added to subsection (d) in order to define the term "erroneous information."

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. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have known to be false, at the time the information was submitted.**
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, 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)(7)]

Comment 10:

B.27 Credible Evidence - the condition should be eliminated from the permit because it is beyond the State's authority to include this provision.

Response 10:

B.27 Credible Evidence - IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

Comment 11:

C.19 Compliance Monitoring Plan - We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We request that all references to a Compliance Response Plan be eliminated from this condition.

Response 11:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and

schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment.

The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

Comment 12:

C.24 General Reporting Requirements - 326 IAC 2-7-5(3)(C) requires submittal of monitoring reports at least every six months. Under this permit, we are required to submit an annual Compliance Certification, a quarterly Compliance Monitoring Report, and a semiannual Deviation Report. We believe that semiannual Compliance Monitoring submittal is the proper frequency until a more frequent submittal is specifically requested by the administrator. In addition, we believe that quarterly Compliance Monitoring Report submittal represents an unnecessary burden on our staff.

Response 12:

IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAM feels that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. There may be fact specific cases that would qualify for semi-annual reporting. IDEM is requiring quarterly reporting of the VOC usage from Plant 2 spray booths SB-8 through SB-10 and dip tank, therefore, IDEM feels that a deviation is significant enough to know about more frequently than twice per year. OAM feels that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. The condition will not change.

Comment 13:

Preventive Maintenance Plans listed in Section D - A preventive maintenance plan (PMP) is required for emission control devices as specified at 326 IAC 1-6-3(a)(1). This condition states that a PMP is required for facilities and control devices. Because they are not required, we request that reference to PMP's for facilities be removed.

Response 13:

The requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits), to obtain a permit. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan.

Comment 14:

We do not believe that daily observations of overspray from the surface coating booth's stacks are necessary considering that the placement, integrity, and particle loading of the filters will be verified on a daily basis, at minimum. We were under the understanding, following meetings between our industry managers and IDEM, that this would not be a daily requirement. In addition, stack observations are not an easy, one-minute task at our facility. Because of the height of our building, the booth exhaust stacks are not visible from the ground. Observations of overspray from the stacks will have to be performed from the roof. We believe that weekly observations would observations would be sufficient to ensure compliance with

Response 14:

Complying with the requirements of 326 IAC 6-1-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable.

The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-1 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provision related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. Conditions D.1.9 (renumbered D.10) and D.4.13 (renumbered D.4.14), and the subsequent reporting requirements have been changed as follows:

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks 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. **During periods of inclement weather, these inspections shall be performed as weather permits.** 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.

D.1.11 Record Keeping Requirements

- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections **or notation of specific weather conditions that prevent monthly roof top inspection**, and those additional inspections prescribed by the Preventative Maintenance Plan.

D.4.14 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks 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. **During periods of inclement weather, these inspections shall be performed as weather permits.** 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.

D.4.15 Record Keeping Requirements

- (d) To document compliance with condition D.4.14, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections **or notation of specific weather conditions that prevent monthly roof top inspection**, and those additional inspections prescribed by the Preventative Maintenance Plan.

Comment 15:

We do not believe that daily visible emissions notations of the woodworking baghouse stack exhaust are necessary to verify compliance with 326 IAC 6-1-2 or proper operation. Weekly visible emissions notations coupled with quarterly bag inspections would be sufficient to verify compliance and proper baghouse operation.

Response 15:

Daily visual emissions (VEs) are only required when venting to the atmosphere. Daily VE notations can detect early warning signs of bag failure. Daily VEs notations to determine particulate matter exceedances is the best way to assure compliance with 326 IAC 6-1-2.

Comment 16:

The surface coating and woodworking stacks can only be seen from the roof of our building. We are concerned that our staff may be required to access the roof during periods of poor weather when personal safety is an issue. If observations and visible emissions notations are unavoidable, we wish to request that the following statement be added to the conditions: "During periods of inclement weather, observations and visible emissions notations will be performed weather permitting."

Response 16:

The daily inspections can be performed from the ground. The individual performing the inspections need only find a location where the stacks can be viewed and the emissions observed. The surface coating monitoring requirements have been changed, please refer to response number 14.

Comment 17:

We believe that specific time frames for conducting baghouse inspections should be included in our preventive maintenance plan. These time frames should not be included as specific conditions in the permit.

Response 17:

326 IAC 2-7-5(3)(A) gives the OAM the authority to require any necessary compliance monitoring to ensure the source is in compliance with the Part 70 permit requirements. The OAM believes that quarterly baghouse and cyclone inspections are necessary to ensure the control equipment is operating properly.

Comment 18:

Conditions requiring shutdown of control equipment during malfunction conditions are specifically covered by section Emergency Provisions. This source wide requirement is applicable for all control equipment at our facility. In addition, (a) appears to contradict the intent of condition (b).

While condition (b) follows agreements reached between our industry managers and IDEM and allows us to postpone repair until a break time or shift change, condition (a) requires us to discontinue woodworking operations upon bag failure in our single compartment baghouse. Regarding condition (b), IDEM had agreed that sawdust is not a noxious material that would present an immediate health concern. We also agreed to initiate the same response steps within eight hours of observing abnormal emissions from the baghouse stack.

Response 18:

Torn or otherwise failed bags can have a dramatic effect on bag house performance and few sources have reliable information that demonstrates that compliance can be achieved when compartments are "on line" with torn bags. The conditions D.2.7 and D.5.7 have been revised as follows to clarify that the emergency provisions of the Title V rule and the corresponding condition in this permit may take precedence if applicable.

D.2.7 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. ~~For single compartment baghouses, failed units and the associated process 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 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.~~ **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).**

Comment 19:

We do not believe that our facility should be required to sample our coal 3 times per year, as specified in the permit. This sampling methodology would apply to a boiler of greater than or equal to 1,500 mmBtu/hr capacity, or of 100 to 1,500 MMBTU/hr capacity. 326 IAC 7-2 does not contain specific requirements for sampling coal for boilers under 100 MMBTU/hr capacity. We believe that records of analysis from our suppliers are adequate to confirm compliance with 326 IAC 7-2, as has historically been required, and that no additional sampling is required by this rule.

Response 19:

Because neither 326 IAC 3 nor 326 IAC 7 contain specific compliance procedures for boilers of this size, 326 IAC 2-7-6 requires that this permit establish a method to demonstrate compliance with the applicable emission limit for sulfur dioxide. In the draft permit, the OAM required each source to sample the coal at the premises where it was to be burned, because there are many variables that could account for an error in the vendor analysis. The OAM was particularly concerned with errors that could occur in the transfer of coal from one site to another where shipments of coal with different sulfur contents might become mixed. Another source or error might occur from sampling at mine sites that mine vast amounts of coal per day and take samples from only one area of the mine. However, the OAM believes that it is appropriate to require a less resource intensive procedure than was indicated in the draft permit. Condition D.3.5, D.3.7, D.3.8, and the corresponding report form and D.6.5, D.6.7, D.6.8, and the corresponding report form have been changed as follows:

~~D.3.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]~~

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per mmBtu when burning coal. Compliance shall be determined utilizing one of the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:**
- (1) The name of the coal supplier; and**
 - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and**
 - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and**
 - (4) The methods used to determine the properties of the coal; or**
- (a)(b) Sampling and analyzing the coal** ~~Coal sampling and analysis shall be performed using one of the following procedures:~~
- (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:**

- (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
- (B) Coal shall be sampled at least ~~three (3)~~ **one (1)** times per day; ~~and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;~~
- (C) Minimum sample size shall be five hundred (500) grams;
- (D) Samples shall be composited and analyzed at the end of each calendar month;
- (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or

~~(b) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);~~

~~(e)(2)~~ Sample and analyze the coal pursuant to 326 IAC 3-7-3; or

~~(b) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]~~

(c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through ~~(4)~~ **(5)** below. Records maintained for (1) through ~~(4)~~ **(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.3.1 and D.3.2.

(1) Calendar dates covered in the compliance determination period; **and**

(2) Actual coal usage since last compliance determination period; **and**

(3) Sulfur content, heat content, and ash content; **and**

(4) Sulfur dioxide emission rates; **and**

(5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.

- ~~(b)~~ Pursuant to 326 IAC 3-7-5(a), owners or operators of sources with total coal-fired capacity greater than or equal to one hundred (100) MMBTU per hour actual heat input shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAM.
- ~~(c)~~(b) To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- ~~(d)~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Title V Quarterly Report

Source Name: JOFCO, Inc. Plant 1
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107
Facility: One (1) ten (10) mmBtu per hour, wood and coal-fired spreader-stoker boiler, identified as B-1
Parameter: Sulfur Dioxide (SO₂)
Limit: 6.0 pounds per million Btu heat input

Months: _____ Year: _____

Month	Monthly Average Coal Sulfur Content (%)	Monthly Average Heat Content (MMBtu/lb)	Coal Consumption (Tons)	Equivalent Sulfur Dioxide Emissions (lb/MMBTU)

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

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

~~D.6.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]~~

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per mmBtu when burning coal. Compliance shall be determined utilizing one of the following options:

- (a) **Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:**
- (1) **The name of the coal supplier; and**
 - (2) **The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and**
 - (3) **The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and**
 - (4) **The methods used to determine the properties of the coal; or**
- ~~(a)(b) **Sampling and analyzing the coal** Coal sampling and analysis shall be performed using one of the following procedures:~~
- (1) ~~Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:~~
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least ~~three (3)~~ **one (1)** times per day; ~~and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;~~
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - ~~(b) **Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);**~~

- ~~(e)~~**(2)** Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- ~~(b)~~ Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

D.6.7 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through ~~(4)~~ **(5)** below. Records maintained for (1) through ~~(4)~~ **(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.6.1 and D.6.2.
- (1) Calendar dates covered in the compliance determination period; **and**
 - (2) Actual coal usage since last compliance determination period; **and**
 - (3) Sulfur content, heat content, and ash content; **and**
 - (4) Sulfur dioxide emission rates; **and**
 - (5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.**
- ~~(b)~~ Pursuant to 326 IAC 3-7-5(a), owners or operators of sources with total coal-fired capacity greater than or equal to one hundred (100) MMBTU per hour actual heat input shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAM.
- ~~(e)~~**(b)** To document compliance with Condition D.6.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- ~~(d)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Title V Quarterly Report

Source Name: JOFCO, Inc. Plant 2
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107
Facility: One (1) ten (10) mmBtu per hour, wood and coal-fired spreader-stoker boiler, identified as B-1
Parameter: Sulfur Dioxide (SO₂)
Limit: 6.0 pounds per million Btu heat input

Months: _____ Year: _____

Month	Monthly Average Coal Sulfur Content (%)	Monthly Average Heat Content (MMBtu/lb)	Coal Consumption (Tons)	Equivalent Sulfur Dioxide Emissions (lb/MMBTU)

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

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

Comment 20:

Would the movement of emission equipment (spray booths, ovens, dip tanks, boilers) within or between plants be restricted in any way and what form of notification would IDEM require for any such move?

Response 20:

JOFCO, Inc. Plant 1 and Plant 2 are now considered one source. There are no restrictions or need for notification when moving equipment from one area to another within the source or between plants, as long as a new rule is not triggered. For example, if a dip tank is moved from Plant 2 to Plant 1 the Facility Description for the corresponding spray booths/dip tanks, D Sections, would change. Since, the change (pursuant to 326 IAC 2-7-11(a)(8)) revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, then an administrative amendment to the Part 70 Permit should be submitted and the source may implement the changes addressed immediately upon submittal.

Comment 21:

Would the same actual equipment have to be used? In other words, would we be allowed to replace a 25 year old, 15 foot long spray booth with a 10,000 C.F.M. exhaust with a newly constructed booth of the same parameters if the decision was made to move the booth.

Response 21:

As long as the rules requiring a construction permit are not triggered it would be possible to move and replace an existing spray booth.

Comment 22:

What are the PSD ramifications if both plants are combined under one permit.

Response 22:

Plant 1 is considered major for PSD. However, surface coating booths 1-7 were constructed before 1977, which excludes them from the applicability of PSD limitations. The booths have the potential to emit greater than 250 tons per year. Any units constructed after August 7, 1977 would have to be limited to PSD limitations.

Plant 2 is considered major for PSD. Surface coating booths 1-7 are subject to BACT and are allowed to emit over 25 tons per year. Potentially, these booths may emit over 250 tons per year. Booths 8-11 are limited to less than 25 tons per year to avoid BACT analysis. With a potential of greater than 250 tons per year, this plant is considered major. Therefore, any units constructed after 1991 (the date of construction for booth 11), would be limited to PSD limitations.

As a combined source, the potential to emit is greater than 250 tons per year. Any new units constructed would be limited to PSD limitations for all criteria pollutants.

Upon further review, the OAM has decided to make the following changes:

1. Condition B.12 (Preventative Maintenance Plan) has been changed because IDEM acknowledges that the preventative maintenance plan provision does not protect a source from violating any limitation on emissions or potential to emit contained in their permit by simply submitting a PMP to IDEM, OAM. However, since PMPs may or may not be sufficient to prevent these violations, IDEM, OAM will change the language in subsection (b) and add language to subsection (c) for the purpose of establishing a protocol for correcting deficient PMPs. The changes are as follows:

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 (this time frame is determined on a case by case basis but no more than 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
(and local agency when applicable)

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventative Maintenance Plan** 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, ***(and local agency when applicable)*** upon request and shall be subject to review and approval by IDEM, OAM, ***(and local agency when applicable)***. **IDEM, OAM, *(and local agency when applicable)* may require the Permittee to revise its preventative maintenance plan whenever lack of proper maintenance causes or contributes to any violation.**

2. Condition C.3 has been changed to reflect the new rule 326 IAC 5-1. The changes are as follows:
C.3 Opacity [326 IAC 5-1]

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 nonoverlapping integrated averages for a continuous opacity monitor** in a six (6) hour period.

3. Sections D.1 through D.3 list facility description and rule applicability for equipment located at Plant 2 incorrectly. The correct Plant number is Plant 1. OAM has made the following change to the permit.

PLANT # 2-1

SECTION D.1 FACILITY OPERATION CONDITIONS

4. Spray booth construction dates were inadvertently left out of the facility description at plant 2. OAM has made the following changes to the permit.

PLANT 2

- (1) Twelve (12) surface coaters exhausting to stacks SC-1 through SC-20, with dry filters for particulate control, consisting of the following:
- (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
 - (b) three (3) spray booths identified as SB-8 through SB-10, constructed in **1988**;
 - (c) one (1) spray booth identified as SB-11, constructed in **1991**; and
 - (d) one (1) dip tank, constructed in **1988**.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Twelve (12) surface coaters exhausting to stacks SC-1 through SC-20, with dry filters for particulate control, consisting of the following:

- (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
- (b) three (3) spray booths identified as SB-8 through SB-10, constructed in **1988**;
- (c) one (1) spray booth identified as SB-11, constructed in **1991**; and
- (d) one (1) dip tank, constructed in **1988**.

5. The following condition has been added to section D.1 and D.4 of the final Part 70 permit:

~~**D.1.1 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.**~~

6. Condition D.1.4 (now renumbered D.1.5) has been changed as follows:

~~**D.1.5 Volatile Organic Compound (VOC)**~~

~~Any **physical** change or modification **which may increase potential emission from the** to-
surface coating operation, **shall require** needs-prior approval **from the OAM to determine**
applicability requirements of 326 IAC 8, before such change may occur.~~

7. Condition D.2.2 (Baghouse Limitations) has been added:

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

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

- (a) **Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.**
 - (b) **The opacity from each baghouse shall not exceed ten percent (10%).**
8. Condition D.2.6 (Visible Emissions) has been added:

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

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

- (1) **The baghouse shall be inspected.**
 - (2) **Corrective actions, such as replacing or reseating bags, are initiated, when necessary.**
9. Condition D.2.7 (Visible Emissions Notations) has been changes as follows:

D.2.7 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.2.6 are not required, and will be replaced by the following:

- (a) Daily visible emission notations of the three (3) baghouses stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

10. Condition D.4.5 (now renumbered D.4.6) has been changed as follows:

D.4.6 Volatile Organic Compound (VOC)

Any change or modification **which may increase potential emission from ~~to~~ SB-1 through SB-7 and SB-11, needs shall require** prior approval **from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.**

11. Condition D.5.2 (Baghouse Limitations) has been added:

D.5.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

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

12. Condition D.5.6 (Visible Emissions) has been added:

D.5.6 Visible Emissions [326 IAC 2-7-1(21)(G)(xxix)]

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

- (1) **The baghouse shall be inspected.**
- (2) **Corrective actions, such as replacing or reseating bags, are initiated, when necessary.**

13. Condition D.5.7 (Visible Emissions Notations) has been changes as follows:

D.5.7 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.5.6 are not required, and will be replaced by the following:

- (a) **Daily visible emission notations of the three (3) baghouses stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) **In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.