

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**DMI Furniture, Inc. Plant #4  
5<sup>th</sup> and Virginia Street  
Ferdinand, Indiana 47532**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-5994-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary wood household furniture manufacturing plant .

Responsible Official: Richard Rosbottom  
Source Address: 5<sup>th</sup> and Virginia Street, Ferdinand, IN 47532  
Mailing Address: P.O. Box 129, Huntingburg, IN 47542  
SIC Code: 2511  
County Location: Dubois  
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)]

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

- (a) The following sixteen (16) surface coating operations:
- (1) One (1) rollcoat booth identified as emission unit 04E1, with a maximum capacity of 1.5 pounds per hour, and exhausting internally.
  - (2) One (1) surface coating booth, identified as emission unit 04F1, with a maximum capacity of 35.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F1.
  - (3) One (1) surface coating booth, identified as emission unit 04F2, with a maximum capacity of 35.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F2.
  - (4) One (1) surface coating booth, identified as emission unit 04F3, with a maximum capacity of 24.3 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F3.
  - (5) One (1) surface coating booth, identified as emission unit 04F4, with a maximum capacity of 40.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F4.
  - (6) One (1) surface coating booth, identified as emission unit 04F5, with a maximum capacity of 44.5 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F5.

- (7) One (1) surface coating booth, identified as emission unit 04A1, with a maximum capacity of 12.1 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A1.
  - (8) One (1) surface coating booth, identified as emission unit 04A2, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A2.
  - (9) One (1) surface coating booth, identified as emission unit 04A3, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A3.
  - (10) One (1) surface coating booth, identified as emission unit 04A4, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A4.
  - (11) One (1) surface coating booth, identified as emission unit 04A5, with a maximum capacity of 29.6 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A5.
  - (12) One (1) adhesives application area, identified as emission unit 04D1, with a maximum capacity of 1.0 pound per hour, and exhausting internally.
  - (13) Two (2) rollcoat booths, identified as emission units 04P1C and 04P1D, with a maximum total capacity of 32.4 pounds per hour, and exhausting internally.
  - (14) One (1) rollcoat booth, identified as emission unit 04P3, with a maximum capacity of 3 pounds per hour, and exhausting internally.
  - (15) One (1) sealer machine, identified as emission unit 04P5, with a maximum capacity of 12.1 pounds per hour and exhausting internally.
- (b) One (1) wood fired boiler, identified as 04B1, with a maximum capacity of 10.5 million Btu per hour and exhausting at one stack, identified as 04B1.

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):

One (1) woodworking operation with a maximum throughput of 3810 pounds per hour. Emissions shall be controlled by one baghouse, and exhausted at three (3) stacks, identified as 04BH1.

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]

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(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]

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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)]

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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)]

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(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)]

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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)]

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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)]

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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)]

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(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 permitted activity in order to maintain compliance with the conditions of this permit.

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

- (a) 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.
- (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]**

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

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

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

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

B.13 Emergency 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 permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, 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]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, 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 the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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

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

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

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints 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)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

**C.1 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.2 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

**C.6 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.7 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.8 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.9 Performance Testing [326 IAC 3-6]**

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- (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.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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

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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.12 Monitoring Methods [326 IAC 3]**

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

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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 October 14, 1998.
- (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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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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 tot his condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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

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

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

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

**C.17 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] [326 IAC 2-7-19 (e)]

- (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;
  - (2) Indicate actual emissions of other regulated pollutants from the source.
- (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.18 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon request of an IDEM, OAM, representative. The records may

be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of 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.20 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 Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
  
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## **]SECTION D.1 FACILITY OPERATION CONDITIONS - Surface coating operations**

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

The following sixteen (16) surface coating operations:

- (1) One (1) rollcoat booth identified as emission unit 04E1, with a maximum capacity of 1.5 pounds per hour, and exhausting internally.
- (2) One (1) surface coating booth, identified as emission unit 04F1, with a maximum capacity of 35.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F1.
- (3) One (1) surface coating booth, identified as emission unit 04F2, with a maximum capacity of 35.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F2.
- (4) One (1) surface coating booth, identified as emission unit 04F3, with a maximum capacity of 24.3 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F3.
- (5) One (1) surface coating booth, identified as emission unit 04F4, with a maximum capacity of 40.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F4.
- (6) One (1) surface coating booth, identified as emission unit 04F5, with a maximum capacity of 44.5 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F5.
- (7) One (1) surface coating booth, identified as emission unit 04A1, with a maximum capacity of 12.1 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A1.
- (8) One (1) surface coating booth, identified as emission unit 04A2, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A2.
- (9) One (1) surface coating booth, identified as emission unit 04A3, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A3.
- (10) One (1) surface coating booth, identified as emission unit 04A4, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A4.
- (11) One (1) surface coating booth, identified as emission unit 04A5, with a maximum capacity of 29.6 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A5.
- (12) One (1) adhesives application area, identified as emission unit 04D1, with a maximum capacity of 1.0 pound per hour, and exhausting internally.
- (13) Two (2) rollcoat booths, identified as emission units 04P1C and 04P1D, with a maximum total capacity of 32.4 pounds per hour, and exhausting internally.
- (14) One (1) rollcoat booth, identified as emission unit 04P3, with a maximum capacity of 3 pounds per hour, and exhausting internally.
- (15) One (1) sealer machine, identified as emission unit 04P5, with a maximum capacity of 12.1 pounds per hour and exhausting internally.

### **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 Volatile Organic Compound (VOC)

Any physical change or modification which may increase potential emissions 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.1.3 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the PM from the spray booths emission units 04A1, 04A2, 04A3, 04A4, 04A5, 04F1 04F2, 04F3, 04F4, and 04F5, shall be limited to 0.03 grain per dry standard cubic foot.

D.1.4 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 Pollutant (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average VHAP content across all coatings of 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 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions; or
    - (D) Use a combination of (A), (B), and (C).
  - (2) Limit VHAP emissions from 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 pounds VHAP per pound solids;
    - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP, per pound solid; or
    - (C) Use a control device to limit emissions.
  - (3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**D.1.6 Work Practice Standards [40 CFR 63.803]**

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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.

**Compliance Determination Requirements**

**D.1.7 Testing Requirements [326 IAC 2-7-6(1), (6)][40 CFR 63, Subpart JJ]**

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- (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) If the OAM requests, compliance with the limits specified in Conditions D.1.3 and D.1.4 shall be determined by performance tests conducted in accordance with Section C- Performance Testing.

**D.1.8 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.9 Particulate Matter (PM)**

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Pursuant to OP 19-01-91-0319, OP 19-01-91-0320, OP 19-01-91-0321 and OP 19-01-91-0322, each issued on November 30, 1987, the filters for PM control shall be in operation at all times when emission units 04A1, 04A2, 04A3, 04A4, 04A5, 04F1, 04F2, 04F3, 04F4 and 04F5 are in operation.

#### D.1.10 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the filters, weekly observations shall be made of the overspray from the surface coating booths 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

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- (a) To document compliance with Condition D.1.4, 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 limit established in Condition D.1.4.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The VHAP 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 D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

- (c) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections or notations of specific weather conditions that prevent monthly roof top inspections, and those additional inspections prescribed by the Preventive 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

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- (a) An Initial Compliance Report to document compliance with Condition D.1.4 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.1.4 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 - Woodworking operations

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

One (1) woodworking operation with a maximum throughput of 3810 pounds per hour. Emissions shall be controlled by one baghouse, and exhausted at three (3) stacks, identified as 04BH1.

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

#### D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The baghouse does not exceed 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 feet of outlet air. The requirements of this condition will also satisfy the requirements of 326 IAC 6-1-2.

#### D.2.2 Opacity

The opacity from the woodworking operations shall not exceed 10% when vented to the atmosphere.

#### 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 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 Opacity

Testing with this facility is not required by this permit. However, if testing is required, compliance with the limitations in Condition D.2.2 shall be determined by 40 CFR 60, Appendix A, Method 9.

#### D.2.6 Particulate Matter (PM)

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

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

#### D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and 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 woodworking baghouse 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- Wood-fired boiler**

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

One (1) wood fired boiler, identified as 04B1, with a maximum capacity of 10.5 million Btu per hour and exhausting at one stack, identified as 04B1.

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

**D.3.1 Particulate Matter (PM) [326 IAC 6-1-9]**

- (a) Pursuant to 326 IAC 6-1-9 (Nonattainment area particulate limitations: Dubois County), the particulate matter emissions from the 10.5 million Btu per hour heat input boiler shall be limited to 0.6 pounds per million Btu heat input and 9.4 tons per year. The input wood to the boiler shall be limited to 178.03 tons per month based on a rating of 5 MMBtu per hour.
- (b) Pursuant to 326 IAC 6-1-9, the 10.5 million Btu per hour boiler shall not exceed a heat input rate of 5 million Btu per hour.

**D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

#### **Compliance Determination Requirements**

**D.3.3 Testing Requirements [326 IAC 2-7-6(1), (6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

**D.3.4 Record Keeping Requirements**

- (a) To document compliance with Conditions D.3.1 the Permittee shall maintain records of the wood input to the boiler.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.3.5 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, 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.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: DMI Furniture, Inc. Plant #4  
Source Address: 5<sup>th</sup> and Virginia Street, Ferdinand, IN 47532  
Mailing Address: P.O. Box 129, Huntingburg, IN 47542  
Part 70 Permit No.: T037-5994-00017

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

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: DMI Furniture, Inc. Plant #4  
Source Address: 5<sup>th</sup> and Virginia Street, Ferdinand, IN 47532  
Mailing Address: P.O. Box 129, Huntingburg, IN 47542  
Part 70 Permit No.: T037-5994-00017

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
<b>9</b> 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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

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

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

**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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

### PART 70 OPERATING PERMIT Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: DMI Furniture, Inc. Plant #4  
 Source Address: 5<sup>th</sup> and Virginia Street, Ferdinand, Indiana 47532  
 Mailing Address: P.O. Box 129, Huntingburg, Indiana 47542  
 Part 70 Permit No.: T037-5994-00017  
 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 thinners - 10% VHAP content by weight  
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids  
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

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

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinners (% 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						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**PART 70 OPERATING PERMIT  
Quarterly Report**

Source Name: DMI Furniture, Inc. Plant #4  
Source Address: 5<sup>th</sup> and Virginia Street, Ferdinand, IN 47532  
Mailing Address: P.O. Box 129, Huntingburg, Indiana 47542  
Part 70 Permit No.: T037-5994-00017  
Facility: 10.5 MMBtu per hour wood fired boiler  
Parameter: Wood Throughput  
Limit: The input wood to the boiler shall be limited to 178.03 tons per month.

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

Month	Wood Ton/month

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: DMI Furniture, Inc. Plant #4  
Source Address: 5<sup>th</sup> and Virginia Street, Ferdinand, IN 47532  
Mailing Address: P.O. Box 129, Huntingburg, IN 47542  
Part 70 Permit No.: T037-5994-00017

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 semi-annually. 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."

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Compliance 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

## Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

### Source Background and Description

**Source Name:** DMI Furniture, Inc., Plant #4  
**Source Location:** 5<sup>th</sup> and Virginia Street, Ferdinand, Indiana 47532  
**County:** Dubois  
**SIC Code:** 2511  
**Operation Permit No.:** T037-5994-00017  
**Permit Reviewer:** Karen Purtell

The Office of Air Management (OAM) has reviewed a Part 70 permit application from DMI Furniture, Inc. Plant #4, relating to the operation of wood household furniture manufacturing.

### Permitted Emission Units and Pollution Control Equipment

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

- (a) The following twelve (12) surface coating operations:
- (1) One (1) rollcoat booth, identified as emission unit 04E1, with a maximum capacity of 1.5 pounds per hour, and exhausting to one stack, identified as 04E1.
  - (2) One (1) surface coating booth, identified as emission unit 04F1, with a maximum capacity of 35.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F1.
  - (3) One (1) surface coating booth, identified as emission unit 04F2, with a maximum capacity of 35.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F2.
  - (4) One (1) surface coating booth, identified as emission unit 04F3, with a maximum capacity of 24.3 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F3.
  - (5) One (1) surface coating booth, identified as emission unit 04F4, with a maximum capacity of 40.2 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F4.

- (6) One (1) surface coating booth, identified as emission unit 04F5, with a maximum capacity of 44.5 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04F5.
- (7) One (1) surface coating booth, identified as emission unit 04A1, with a maximum capacity of 12.1 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A1.
- (8) One (1) surface coating booth, identified as emission unit 04A2, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A2.
- (9) One (1) surface coating booth, identified as emission unit 04A3, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A3.
- (10) One (1) surface coating booth, identified as emission unit 04A4, with a maximum capacity of 10 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A4.
- (11) One (1) surface coating booth, identified as emission unit 04A5, with a maximum capacity of 29.6 pounds per hour, using dry filters for overspray control and exhausting to one stack, identified as 04A5.
- (12) One (1) surface coating area, identified as emission unit 04D1, with a maximum capacity of 1 pound per hour, and exhausting to one stack, identified as 04D1.
- (b) One (1) woodworking operation with a maximum throughput of 3810 pounds per hour. Emissions shall be controlled by a baghouse, and exhausted at one stack, identified as 04BH1.
- (c) One (1) wood fired boiler, identified as 04B1, with a maximum capacity of 10.5 million Btu per hour and exhausting at one stack, identified as 04B1.

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

The source also consists of the following unpermitted facilities/units. The equipment has existed at the source for 30 years. It has been listed in several renewal applications, however due to an oversight it was not included in the operating permit.

- (a) Two (2) rollcoat booths, identified as emission units 04P1C and 04P1D, with a maximum total capacity of 32.4 pounds per hour, and exhausting at two stacks, identified as 04P1C and 04P1D.
- (b) One (1) rollcoat booth, identified as emission unit 04P3, with a maximum capacity of 3 pounds per hour, and exhausting at one stack, identified as 04P3.
- (c) One (1) sealer machine, identified as emission unit 04P5, with a maximum capacity of 12.1 pounds per hour and exhausting at one stack, identified as 04P5.

### **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):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
- (c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (d) Water based adhesives that are less or equal to 5% by volume of VOCs excluding HAPs.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 19-01-91-0319, issued on November 30, 1987;
- (b) OP 19-01-91-0320, issued on November 30, 1987;
- (c) OP 19-01-91-0321, issued on November 30, 1987; and
- (d) OP 19-01-91-0322, issued on November 30, 1987

All conditions from previous approvals were incorporated into this Part 70 permit.

### **Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.

- (b) The equipment has existed at the source for 30 years and has been listed in several renewal applications. However, due to an oversight it was not included in the operating permits. Therefore, no enforcement actions shall be taken. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### 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 June 3, 1996. Additional information was received on May 8, 1998.

A notice of completeness was mailed to the source on March 13, 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."

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

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

HAP's	Potential Emissions (tons/year)
Xylene	greater than 10
Toluene	greater than 10
Hexane	greater than 10
2-Butanone	greater than 10
Methanol	greater than 10
Ethylbenzene	less than 10
TOTAL	greater than 25

The potential emissions (as defined in 326 IAC 1-2-55) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.78
PM-10	0.70
SO <sub>2</sub>	0.00
VOC	60.15
CO	0.44
NO <sub>x</sub>	0.00
Xylene	10.31
Toluene	16.92
Hexane	3.80
2-butanone	4.88
Methanol	6.88
Ethylbenzene	1.47

**Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Wood fired boiler	9.4	---	---	---	---	---	---
Surface coating Operations	---	---	---	greater than 250	---	---	---
Woodworking	46.12	---	---	---	---	---	---
<b>Total Emissions</b>	<b>55.52</b>	---	---	<b>greater than 250</b>	---	---	---

### County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

### Federal Rule Applicability

#### 40 CFR 60.4, Subpart Dc

The 10.5 million Btu per hour wood fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), due to the date of construction. The boiler was constructed prior to June 9, 1989.

#### 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 pollutant (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average VHAP content across all coatings of 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 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; ; or
    - (C) Use a control device to limit emissions; or
    - (D) Use a combination of (A), (B), and (C).

- (2) Limit the 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 pounds VHAP per pound solids;
  - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid; or
  - (C) Use a control device to limit emissions.
- (3) The strippable spray booth material shall have a maximum VOC content of 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, and the U.S. EPA Region V, to document the ongoing compliance status of the wood furniture coating operations.

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

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

Pursuant to 326 IAC 2-2 and 40 CFR 52.21, this source is a major source. The source did not go through PSD review because the booths were constructed prior to August 1977.

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

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOC. 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 (Visible Emissions Limitations)

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) 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.

The source is located in Dubois county but not in Bainbridge township. Therefore, the source is limited to 40% opacity in twenty-four (24) consecutive readings.

### **State Rule Applicability - Surface coating operations**

#### 326 IAC 6-1-2 (Particulate Matter)

This particular operation of DMI is not one of the specific sources listed in 326 IAC 6-1-9, therefore, this operation will be subject to 326 IAC 6-1-2.

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the PM from the surface coating operations (emission units 04A1, 04A2, 04A3, 04A4, 04A5, 04F1, 04F2, 04F3, 04F4 and 04F5) shall be limited to 0.03 grain per dry standard cubic foot.

The dry filters shall be in operation at all times the surface coating booths are in operation in order to comply with this limit.

#### 326 IAC 8 (Volatile Organic Compounds)

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

There are no other 326 IAC 8 rules that apply.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule only applies to sources constructed after October 7, 1974 and prior to January 1, 1980. The surface coating operations were constructed prior to the applicability date of October 7, 1974, therefore, this rule does not apply.

#### 326 IAC 8-11-1 (Wood Furniture Coatings)

This rule only applies to sources located in Lake, Porter, Clark or Floyd County. This source is located in Dubois county, therefore, this rule does not apply.

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

The OAM has drafted a new rule that will make the woodworking operations insignificant. The new language will allow the source more operational flexibility to add new equipment as long as the facilities can operate under the new conditions. Upon promulgation of the new rules, the source must get an administrative amendment. The administrative amendment will consist of adding the new rule cites.

#### Opacity

The opacity from the woodworking operations shall not exceed 10% when vented to the atmosphere.

#### Baghouse limitations

Baghouse limitations: The baghouse does 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 feet of outlet air.

#### 326 IAC 6-1-2 (Particulate Matter)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking facilities shall be limited to 0.03 grains per dry standard cubic foot. Compliance with the woodworking insignificant activity requirements will also satisfy the requirements of 326 IAC 6-1-2.

### **State Rule Applicability - 10.5 MMBtu per hour Boiler**

#### **326 IAC 6-1-9 (Particulate Matter (PM))**

- (a) Pursuant to 326 IAC 6-1-9 (Nonattainment area particulate limitations: Dubois County), the particulate matter emissions from the 10.5 million Btu per hour heat input boiler shall be limited to 0.6 pounds per million Btu heat input and 9.4 tons per year. The input wood to the boiler shall be limited to 178.03 tons per month based on a rating of 5 MMBtu per hour.
- (b) Pursuant to 326 IAC 6-1-9, the 10.5 million Btu per hour boiler shall not exceed a heat input rate of 5 million Btu per hour.

Although the source is currently operating under the name DMI, Plant #4, 326 IAC 6-1-9 lists the source's original name, Dolly Madison #4.

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

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

1. The surface coating operations, emission units 04A1, 04A2, 04A3, 04A4, 04A5, 04F1, 04F2, 04F3, 04F4 and 04F5 have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the 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.
- (b) Weekly inspections shall be performed of the coating emissions from the stacks 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 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 compliance 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 inspections are necessary because the filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment area particulate limitations).

2. The woodworking operation has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the woodworking baghouse stack exhausts shall be performed during normal daylight operations when exhausted 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 when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-1-2 (Nonattainment area particulate limitations).

3. The 10.5 million Btu per hour wood fired boiler has applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emission notations of the wood fired boiler exhaust shall be performed during normal daylight operations. 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.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-1-9 (Nonattainment area particulate limitations: Dubois County).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) 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 1990 Clean Air Act Amendments.

### **Conclusion**

The operation of this wood household furniture manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T037-5994-00017.

### Calculations

#### 326 IAC 6-1-9 (Particulate Matter) - wood fired boiler

The PM emissions from the 10.5 million Btu per hour wood/coal fired boiler for is limited to 0.6 pounds per MMBtu per hour and 9.4 tons per year.

Based on a maximum rated capacity of 5.0 MMBtu per hour:

$$(13 \text{ tons/yr})(\text{yr}/8760 \text{ hr})(2000\#/\text{ton})(\text{hr}/5 \text{ MMBtu}) = 0.6 \text{ pounds per MMBtu}$$

The boiler is in compliance with the 0.6 pound per MMBtu per hour limit

Potential PM emissions from the boiler are 13 tons per year. There is no control on the boiler therefore, the boiler is not in compliance with the 9.4 tons per year limit. The wood input for the boiler will be limited to 178.03 tons per month to ensure compliance with the 9.4 tons per year limit.

$$(9.4 \text{ tons/yr})(\text{ton wood}/8.8 \#)(2000\#/\text{ton}) = 2136.36 \text{ tons per year} = 178.03 \text{ tons per month wood input.}$$

#### 326 IAC 6-1-2 - Woodworking Operations

Grain loading limited to 0.03 grains per dry standard cubic foot.

The source's baghouse has a grain loading of 0.01 grains per dry standard cubic foot. Therefore the woodworking operation is in compliance.

This rule limits grain loading to 0.03 grains per dry standard cubic foot.

Airflow of cyclone = 35000 acfm

7000 grains = 1 pound

$$\frac{(0.03 \text{ gr}/\text{ft}^3)(40950 \text{ acfm})(60 \text{ min})}{7000 \text{ grain}} = 10.53 \text{ pounds per hour} = 46.12 \text{ tons per year}$$

\*Note - the source agreed to limit their woodworking operations to 125,000 cubic feet per minute of air flow at a loading of 0.003 grain per dry standard cubic foot of outlet air, so their wood working operations will be considered insignificant under the new rule.

# Indiana Department of Environmental Management Office of Air Management

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

**Source Name:** DMI Furniture, Inc., Plant #4  
**Source Location:** 5<sup>th</sup> and Virginia Street, Ferdinand, Indiana 47532  
**County:** Dubois  
**SIC Code:** 2511  
**Operation Permit No.:** T037-5994-00017  
**Permit Reviewer:** Karen Purtell

On September 18, 1998, the Office of Air Management (OAM) had a notice published in The Herald, Jasper, Indiana, stating that DMI Furniture, Inc., Plant #4 had applied for a Part 70 Operating Permit to operate a wood furniture manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 14, 1998, DMI Furniture, Inc., Plant #4 submitted comments on the proposed Part 70 permit. The summary of the comments is as follows (deleted language appears as ~~strikeouts~~, new language is **Bolded**):

### **Comment 1:**

A.2(a) and D.1, numbers (1), (13), (14) and (15)

Please replace the number of stacks and stack designations with "exhausting internally". For example, number (1) would change from "exhausting to one stack, identified as 04E1" to "exhausting internally".

### **Response 1:**

The above mentioned change has been made to the final permit.

### **Comment 2:**

A.2(b) and D.2

The woodworking baghouse exhausts through three stacks, collectively identified as 04BH1.

### **Response 2:**

The above mentioned change has been made to the final permit.

### **Comment 3:**

B.10(a), 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 a responsible official of truth, accuracy and completeness".

### **Response 3:**

The specific permit conditions requiring submittal of documents will note when the responsible official's certification is required. Condition B.10(a) has been changed as follows:

B.10 Certification [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** ~~Any~~ application forms, 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 4:**

Regarding 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 all 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 19-01-91-0319, 19-01-91-0320, 19-01-91-0321 and 19-01-91-0322, be specifically referenced as no longer valid. These conditions have been duplicated or replaced by conditions in the draft Title V permit.

**Response 4:**

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 believes non-applicable requirement determinations should be dealt with in Section D. OAM is 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 superceded 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 (a) (1) & (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 the previous permits identified by the source and the OAM during the course of this review.

**Comment 5:**

B.28, Credible Evidence

The condition should be eliminated from the permit because it is beyond the State's authority to include this provision.

**Response 5:**

IDEM is removing this provision from the permit. IDEM now believes that it is not necessary to include this condition in the permit. The issues regarding credible evidence can be adequately addressed when a showing of compliance or noncompliance is made. Indiana's air pollution control laws allow the use of any credible evidence in determining compliance or noncompliance. An explicit statement is not required in the permit. Although the permit may set out specific methods to determine compliance, any other method or other credible evidence may be admissible to demonstrate compliance or noncompliance.

~~B.28 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 6:**

C.15, 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 6:**

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 program.

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 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 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 requirements 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 requirements 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 7:**

**C.20(a) 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 Report submittal is the proper frequency until a more frequent submittal is requested by the administrator. In addition, we believe that quarterly Compliance Monitoring Report submittal represents an unnecessary burden on our staff considering the excellent compliance history at this source.

**Response 7:**

The Quarterly Reporting form is necessary to ensure compliance with the wood throughput limit for the 10.5 MMBtu per hour wood fired boiler. The Annual Compliance Certification is required under 326 IAC 2-7-6(5). The Quarterly Compliance Monitoring Report has been changed to a Semi-annual Compliance Monitoring Report. This is the only change to the reporting forms.

**Comment 8:**

D.1.2. VOC

Modification, construction or reconstruction at a source must be performed following rules in 326 IAC 2. Because Article 2 contains general requirements that pertain to all sources and is specifically referenced by section B.23 of this permit, we request that this condition be removed from the permit. We realize that 326 IAC 8 must be consulted to determine if additional regulations will become applicable, however, it is necessary to obtain prior approval from IDEM for a modification that is exempt from construction permitting requirements under 326 IAC 2 and below applicability thresholds in 326 IAC 8.

**Response 8:**

The purpose of this condition is to indicate that any physical change or modification made to the permitted units might make the operation subject to existing 8 rules that have previously not been applicable. Change in coatings from the previous submitted MSDS are not covered under this condition and do not require notification. In addition, this condition supplements B.23, to ensure that proper VOC rule evaluation is done if any modification request is received by OAM.

The word **physical** has been added the condition.

**Comment 9:**

D.1.5, D.2.3 and D.3.2 Preventive Maintenance Plan

A Preventive Maintenance Plan (PMP) is required for emission control devices as specified at 326 IAC 1-6-3(a)(1) and permit condition B.12. This condition states that a PMP is required for facilities and control devices. Because they are not required, we request that reference to PMPs for facilities be removed.

**Response 9:**

Pursuant to 326 IAC 2-7-4(c)(9) Permit Application, confirmation that the source maintains on-site a Preventive Maintenance Plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all the following must be included in each Part 70 permit:

- (1) Maintain on-site the Preventive Maintenance Plan as required under 326 IAC 2-7-4(c)(9);
- (2) Implement the Preventive Maintenance Plan; and,
- (3) Forward to the department upon request the Preventive Maintenance Plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirements to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2(Registration) and 326 IAC 2-1-4 (Operating Permits). The conditions have not been changed.

**Comment 10:**

D.1.10(a), Monitoring

We do not believe that daily observations of overspray from the surface coating booths' 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 for our facility. Because of the height of our buildings, the booth exhaust stacks are not visible from the ground. Observations of overspray from the stacks will have to be preformed from the roof. We believe that weekly observations would be sufficiently to ensure compliance with 326 IAC 6-1-2, and that daily observations present an unnecessary burden for our staff. In addition, we believe that our facility has a positive record of compliance and attention to protection of our community's public health. We believe that increased frequency of observations should be based on our history, no the history of other facilities.

**Response 10:**

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 6-1-2 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 provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly.

The conditions D.1.10 and 1.11(c) 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Record Keeping Requirements

- (c) To document compliance with Condition D.1.9 and D.1.10, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, **or notations of specific weather conditions that prevent monthly roof top inspections**, and those additional inspections prescribed by the Preventive Maintenance Plan.

**Comment 11:**

D.2.7(a), Visible Emissions Notations

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 baghouse inspections would be sufficient to verify compliance and proper baghouse operation.

**Response 11:**

The new rule for insignificant woodworking requires daily visible emissions notations. DMI Furniture requested the new insignificant woodworking language be included in the Title V permit. Additionally, the visible emissions notations are designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. The condition has not been changed.

**Comment 12:**

D.1.10(a) and D.2.7(a)

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 12:**

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.

Condition D.2.7(a) has not been changed. Condition D.1.10 has been changed as stated in Response number 10.

**Comment 13:**

D.2.8, Baghouse Inspections

We believe that specific time frames for conducting baghouse inspections should be included in our Preventive Maintenance Plan as required under condition D.2.3. These time frames should not be included as specific conditions in the permit. We request that condition D.2.8 be removed.

**Response 13:**

326 IAC 1-7-5(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 inspections are necessary ensure the control equipment is operating properly. The condition has not been changed.

**Comment 14:**

D.2.9, Broken Bag or Failure Detection

Conditions requiring shutdown of control equipment during malfunction conditions are specifically covered by section B.13, Emergency Provisions. This source wide requirement is applicable for all control equipment at our facility. In addition, condition (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 to the populations in the vicinity of our facility. Therefore, IDEM granted permission to continue woodworking operations in the event of a bag failure provided that certain guidelines, mirrored by condition (b), are followed. We also agreed to initiate the same response steps within eight hours of observing abnormal emissions from the baghouse stack. DMI respectively requests that condition D.2.9(a) be removed.

**Response 14:**

Pursuant to 326 IAC 2-7-5(1)(F), each Part 70 permit is required to contain conditions which minimize excess emissions, to the extent feasible, caused by events such as a bag failure. The requirements shall take into consideration available technologies, safety cost, and other relevant factors. The OAM does not consider shutting down the baghouse and associated production equipment to be infeasible in this case. Many sources which vent their baghouse exhaust in the buildings during winter months will shutdown production during such bag failures.

A bag failure could be construed as an "emergency" as defined in condition B. 13 for purposes of an affirmative defense against a violation of the specific permit condition. However, once the bag failure is observed, continuing to operate the equipment and venting uncontrolled particulate matter to the atmosphere may not be considered an attempt by the Permittee to take all reasonable steps to minimize levels of emissions that exceed an emission standard or other requirement in the permit.

Therefore, the OAM believes that the requirement to shutdown the affected compartments is a reasonable action to ensure compliance with the particulate matter limitations.

The condition has been changed as follows:

**D.2.9 Broken or Failed Bag or Failure Detection**

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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 15:**

D.3.1(b) Particulate Matter

We do not believe that a 5 MMBtu per hour heat input limit is necessary or required to remain compliant with the limit specified at 326 IAC 6-1-9, and respectfully request that this limit be removed. The permit specifically lists 10.5 MMBtu per hour heat input and states, "The particulate matter emissions from the boiler shall be limited to 0.6 pound per million Btu's and 9.4 tons per year pursuant to 326 IAC 6-1-9."

The emission unit description in the SIP, "5 MMBtu per hour boiler", is only a description and does not represent an operational limit. We do not know why the SIP description specifies a 5 MMBtu per hour boiler while our permits have specified a 10.5 MMBtu per hour boiler. As far as we have determined, this boiler has always been rated at 10.5 MMBtu per hour (250 hp). Both the 0.6 lb PM per MMBtu and 9.4 tons PM per year emissions limits are valid, measurable limits against which emissions can be tracked, regardless of boiler capacity. A permit limit must be a measurable quantity or rate that can be verified. We do not have a practical method that could be used to verify compliance with a heat input limit, and do not believe that 5 MMBtu per hour was meant to be a heat input limit.

**Response 15:**

The current state rule lists the boiler as being limited to 5 MMBtu per hour. The Permit must be issued under the current state rule. Therefore, the heat input rate cannot be changed. This rule will be revised in the near future. If the heat input rate for the boiler is changed, the source can request a modification to their Title V permit.

**Comment 16:**

D.3.4(a) Visible Emissions Notations

Our boiler does not have a control device, nor does it operate as a control device. It was our understanding, following IDEM's guidance, that we would not have to perform parametric monitoring on facilities that do not have a control device. In addition, the boiler's allowable particulate matter emission rate is below 10 pounds per hour. However, if visible emissions notations are unavoidable, we do not believe that daily notations of the boiler stack exhaust are necessary to verify compliance with 326 IAC 6-1-9 or normal boiler operations. Weekly visible emissions notations coupled with normal day to day boiler operation procedures would be sufficient to verify compliance and proper boiler operation.

**Response 16:**

Condition D.3.4 has been removed from the final permit.

**Comment 17:**

A.2(a) and D.1, number (12)

Please change this emission unit description to "one (1) adhesives application area, identified as emission unit 04D1, with a maximum capacity of 1.0 pounds per hour and exhausting internally."

**Response 17:**

The above mentioned change has been made.

**Comment 18:**

C.13, Emergency Reduction Plans.

We have included an Emergency Reduction Plan for our source with this public comment letter. We request that the condition be amended to reflect that a Plan has been submitted.

**Response 18:**

Condition C.13, Emergency Reduction Plan, has been changed to reflect that an Emergency Plan has been submitted.

Upon further review, OAM has made the following changes to the final Part 70 permit. The Table Of Contents has been modified to reflect these changes.

(1) Condition C.2 has been changed as follows:

C.2 Opacity [326 IAC 5-1]

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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 forty percent (40%) ~~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.

- (2) The following condition has been added to the final permit:

**D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]**

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**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.**

- (3) The woodworking operations have been moved from the A.2 (Emission Units and Pollution Control Equipment Summary) to A.3 (Specifically Regulated Insignificant Activities) in the final Part 70 Permit.