

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**Indiana Furniture Industries
Plant ID# 037-00027
1224 Mill Street
Jasper, Indiana 47547**

and

**Indiana Dimension
Plant ID 037-00068
13th & Vine Street
Jasper, Indiana 47547**

(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.:T037-6036-00104	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

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

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

Responsible Official: Indiana Furniture: John Bieker
Responsible Official: Indiana Dimension: Larry Uhrick
Source Address: Indiana Furniture: 1224 Mill Street, Jasper, Indiana 47547
Source Address: Indiana Dimension: 13th and Vine Street, Jasper, Indiana 47547
Mailing Address: Both: P.O. Box 270, 1224 Mill Street, Jasper, Indiana 47547
SIC Code: 2511
County Location: Dubois County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major under PSD
Major Source, Section 112 of the Clean Air Act

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

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

Indiana Furniture Industries Plant

- (a) Ten (10) wood desk surface coating booths, consisting of the following:
- (1) One (1) glaze booth, identified as emission unit number 145, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID# 12.
 - (2) One (1) SAP booth, identified as emission unit number 225, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID#3.
 - (3) One (1) NGR booth, identified as emission unit number 227, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #4 .
 - (4) One (1) washcoat booth, identified as emission unit number 228, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID# 5.

- (5) One (1) wipestain booth, identified as emission unit number 229, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #6.
 - (6) One (1) sealer booth, identified as emissions unit number 230, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #7.
 - (7) One (1) first lacquer booth, identified as emission unit number 232, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #8.
 - (8) One (1) downdraft booth, identified as emission unit number 233, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters. One self contained sanding booth and a flash off booth labeled as stacks 9A and 9B.
 - (9) One (1) trim line booth, identified as emission unit number 234, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #11.
 - (10) One (1) off-line booth, identified as emission unit number 438, with a maximum rating of 23 desks per hour.
- (b) Woodworking operations with particulate matter controlled by a baghouse and exhausted through stack/vent ID #1.
 - (c) One (1) wood/coal fired boiler, identified as emission unit 107, with a maximum rating of 200 horsepower per hour (7MM Btu per hour), using a cyclone as control and exhausted to stack/vent ID #2.

Indiana Dimension Plant

- (a) One (1) wood chair surface coating booth, identified as emission unit number 457, with a maximum rating of 7.5 chairs per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent #2.
- (b) Woodworking operations with particulate matter controlled by a baghouse and exhausted through stack/vent ID #3.
- (c) One (1) wood/coal fired boiler, identified as emission unit 300, with a maximum rating of 150 horsepower per hour (5 MMBtu per hour), using a cyclone as control and exhausted to stack/vent ID #1.

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

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

Indiana Furniture Industries Plant

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

Indiana Dimension Plant

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

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

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

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

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

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

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

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

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, 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) 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]

- (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]

- (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.

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

C.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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted for Indiana Furniture Industries on October 15, 1997. The plan consists of:

- (a) Applying water to the unpaved parking lot;
- (b) Posting six (6) five mile per hour speed limit signs with two at each entry;
- (c) The wood scrap infeed system for boiler will be shut down when the new gas fired boiler is implemented into the process. The wood scrap infeed system will only be used as a backup means for providing wood for the boiler.

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification

requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee:

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

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

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

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

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

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

C.13 Monitoring Methods [326 IAC 3]

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

(a) Submit:

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

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

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM,. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 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.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

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

C.19 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of 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.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B-Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

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

SECTION D.1 FACILITY OPERATION CONDITIONS - surface coating booths

Indiana Furniture Industries

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

Ten (10) wood desk surface coating booths, consisting of the following:

One (1) glaze booth, identified as emission unit number 145, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID# 12.

One (1) SAP booth, identified as emission unit number 225, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID#3.

One (1) NGR booth, identified as emission unit number 227, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #4.

One (1) washcoat booth, identified as emission unit number 228, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID# 5.

One (1) wipestain booth, identified as emission unit number 229, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #6.

One (1) sealer booth, identified as emissions unit number 230, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #7.

One (1) first lacquer booth, identified as emission unit number 232, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #8.

One (1) downdraft booth, identified as emission unit number 233, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters. One self contained sanding booth and a flash off booth labeled as stacks 9A and 9B.

One (1) trim line booth, identified as emission unit number 234, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #11.

One (1) off-line booth, identified as emission unit number 438, with a maximum rating of 23 desks per hour.

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 Nonattainment Area Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, particulate matter emissions from each of the ten (10) spray booths, EU 145, 225, 227, 228, 229, 230, 232, 233, 234, and 438 shall not exceed 0.03 grains per dry standard cubic foot.

D.1.3 Volatile Organic Compound (VOC)

Any change or modification which may increase potential emissions from the wood desk surface coating booths, shall require prior approval from the OAM, before such change may occur.

D.1.4 Volatile Organic Compounds (VOC)) (326 IAC 8-2-12)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to the wood chair surface coating booth, emission unit number 233, shall utilize one of the following application methods:

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

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

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (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 compliance 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 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.
 - (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.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.7 Work Practice Standards [40 CFR 63.803]

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

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

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1), (6)][40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) If the OAM requests, compliance with the limits specified in Conditions D.1.2 and D.1.5 shall be determined by performance tests conducted in accordance with Section C- Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 Particulate Matter (PM)

The dry filters for PM overspray control shall be in operation at all times when the surface coating booths are in operation.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. 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.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, 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.1.5.
- (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.1.7, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly 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.1.13 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.1.5 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.1.5 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 operation

Indiana Furniture Industries Plant

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

A woodworking operation with particulate matter controlled by a baghouse and exhausted through stack/vent ID#1.

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

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

Pursuant to 326 IAC 6-1-9, the particulate matter emissions from the woodworking operations shall be limited to 5.4 tons per year.

D.2.2 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.2.3 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 PM limit specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 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.2.5 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.2.6 Baghouse Inspections

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

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed.

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5 and D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stack exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 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/coal fired boiler

Indiana Furniture Industries Plant

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

One (1) wood/coal fired boiler, identified as emission unit 107, with a maximum rating of 200 horsepower (7 MMBtu per hour), using a cyclone as control and exhausted to stack/vent ID #2. The wood/coal fired boiler shall be used only in emergency situations.

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 200 horsepower (7 MMBtu per hour) heat input boiler shall be limited to 0.6 pounds per million Btu heat input and 5.2 tons per year.
- (b) The input coal to the boiler shall be limited to 141.61 tons per month. The input wood to the boiler shall be limited to 257.41 tons per month. For every one (1) ton of wood used the coal limit shall be reduced by 1.8 tons.

D.3.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the 200 horsepower (7MMBtu) per hour wood/coal fired boiler shall not exceed six (6.0) pounds per million Btu heat input.

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

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

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the wood/coal fired boiler is in operation.

D.3.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

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

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

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

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

D.3.7 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone stack 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.

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

D.3.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.3.1 and D.3.2.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual coal usage since last compliance determination period; and
 - (3) Sulfur content, heat content and ash content; and
 - (4) Sulfur dioxide emission rates; and
 - (5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.
- (b) To document compliance with Conditions D.3.5 and D.3.7, the Permittee shall maintain records of visible emissions notations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1 and D.3.2 shall be submitted to the address listed in Condition C- General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS-Natural gas fired boilers

Indiana Furniture Industries Plant

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

- (1) One (1) natural gas fired boiler, with a maximum rating of 10 MMBtu per hour.
- (2) One (1) natural gas fired boiler, with a maximum rating of 6.7 MMBtu per hour.

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

D.4.1 Nonattainment Area Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, particulate matter emissions from the 10 MMBtu per hour and the 6.7 MMBtu per hour natural gas boilers shall not exceed 0.01 grains per dry standard cubic foot.

Compliance Determination Requirement

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

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

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

D.4.3 Record Keeping Requirements

Pursuant to 40 CFR 60.40, Subpart Dc, records shall be maintained of the amount of fuel combusted during each day for the 10 MMBtu per hour boiler. All records shall be maintained for a period of two years.

D.4.4 Reporting Requirements

The Permittee shall certify quarterly, on the form provided, that natural gas was fired in the boilers at all times during the report period. Alternatively the Permittee shall report the number of days during which alternate fuel was burned during the report period.

SECTION D.5 FACILITY OPERATION CONDITIONS - surface coating booth

Indiana Dimension Plant

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

One (1) wood chair surface coating booth, identified as emission unit number 457, with a maximum rating of 7.5 units per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #2.

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

D.5.1 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.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to the wood chair surface coating booth, emission unit number 457, shall utilize one of the following application methods:

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

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

D.5.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant CP 037-2052, issued on July 14, 1992, the wood chair surface coating booth, emission unit number 457, shall be limited to 39.6 tons per twelve (12) consecutive month period. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.5.4 Nonattainment Area Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, particulate matter emissions from spray booth emission unit number 457, shall not exceed 0.03 grains per dry standard cubic foot.

D.5.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (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 compliance 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 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.
 - (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.5.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.5.7 Work Practice Standards [40 CFR 63.803]

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

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

Compliance Determination Requirements

D.5.8 Testing Requirements [326 IAC 2-7-6(1), (6)][40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) If the OAM requests, compliance with the limits specified in Conditions D.5.3, D.5.4 and D.5.5 shall be determined by performance tests conducted in accordance with Section C-Performance Testing.

D.5.9 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Conditions D.5.2 and D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2 using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.10 Volatile Organic Compounds (VOC) Emissions

Compliance with Condition D.5.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.5.11 Particulate Matter (PM)

The dry filters for PM overspray control shall be in operation at all times when the surface coating booths are in operation.

D.5.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. 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.5.13 Record Keeping Requirements

- (a) To document compliance with D.5.3, the Permittee shall maintain records as outlined below. The records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.5.3.

The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as clean-up solvents;
- (b) To document compliance with Condition D.5.5, 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.5.5.
 - (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) Copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with D.5.7, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Conditions D.5.11 and D.5.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.14 Reporting Requirements

- (a) A quarterly report to document compliance with Condition D.5.3 shall be submitted 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.
- (b) An Initial Compliance Report to document compliance with Condition D.5.5 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.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.5.5 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.
- (d) The reports required in (b) and (c) 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.6 FACILITY OPERATION CONDITIONS- Woodworking Operations

Indiana Dimension Plant

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

Woodworking operations with particulate matter controlled by a baghouse and exhausted through stack/vent ID #3.

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

D.6.1 Particulate Matter (PM) [326 IAC 6-1-9]

Pursuant to 326 IAC 6-1-9, particulate matter emissions from the woodworking operations shall not exceed 0.4 tons per year.

D.6.2 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.6.3 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.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.4 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.6.5 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.6.6 Baghouse Inspections

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

D.6.7 Broken or Failed Bag Detection

In the event that bag failure has been observed.

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

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.6.8 Record Keeping Requirements

- (a) To document compliance with Condition D.6.4 and D.6.5, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stack exhaust.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records of the results of the inspections required under Condition D.6.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7 FACILITY OPERATION CONDITIONS - Wood/coal fired boiler

Indiana Dimension Plant

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

One (1) wood/coal fired boiler, identified as emission unit 300, with a maximum rating of 150 horsepower (5 MMBtu per hour), using a cyclone as control and exhausted to stack/vent ID #1.

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

D.7.1 Particulate Matter (PM) [326 IAC 6-1-9]

Pursuant to 326 IAC 6-1-9 (Nonattainment area particulate limitations: Dubois County), the particulate matter emissions from the 150 horsepower (5MMBtu) per hour heat input boiler shall be limited to 0.6 pounds per million Btu heat input and 9 tons per year.

D.7.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the 150 horsepower (5 MMBtu per hour) wood/coal fired boiler shall not exceed six (6.0) pounds per million Btu heat input.

D.7.3 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.7.4 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 limits specified in Conditions D.7.1 and D.7.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.7.5 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the wood/coal fired boiler is in operation.

D.7.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

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

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

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

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

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

D.7.7 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone stack 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.

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

D.7.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.7.1 and D.7.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.7.1 and D.7.2.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual coal usage since last compliance determination period; and
 - (3) Sulfur content, heat content, and ash content; and
 - (4) Sulfur dioxide emission rates; and
 - (5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.
- (b) To document compliance with Conditions D.7.5 and D.7.7, the Permittee shall maintain records of visible emissions notations.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.2 shall be submitted to the address listed in Condition C- General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.8 FACILITY OPERATION CONDITIONS- Insignificant Activities

Indiana Furniture Industries Plant and Indiana Dimension Plant

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

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

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

D.8.1 Nonattainment Area Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, particulate matter emissions from the insignificant brazing, soldering and welding equipment and the cutting torches shall not exceed 0.03 grains per dry standard cubic foot.

Compliance Determination Requirement

D.8.2 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.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indiana Dimension
Source Name: Indiana Furniture Industries
Source Address: Indiana Dimension: 13th and Vine, Jasper, Indiana 47547
Source Address: Indiana Furniture: 1224 N. Mill Street, Jasper, Indiana 47547
Mailing Address: P.O. Box 270, 1224 N. Mill Street, Jasper, Indiana 47547-0270
Part 70 Permit No.: T037-6036-00104

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: Indiana Dimension
Source Name: Indiana Furniture Industries
Source Address: Indiana Dimension: 13th and Vine, Jasper, Indiana 47547
Source Address: Indiana Furniture: 1224 N. Mill Street, Jasper, Indiana 47547
Mailing Address: P.O. Box 270, 1224 N. Mill Street, Jasper, Indiana 47547-0270
Part 70 Permit No.: T037-6036-00104

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

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

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

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

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

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Indiana Furniture Industries
Source Address: Indiana Furniture: 1224 N. Mill Street, Jasper, Indiana 47547
Mailing Address: P.O. Box 270, 1224 N. Mill Street, Jasper, Indiana 47547-0270
Part 70 Permit No.: T037-6036-00104

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

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**

Part 70 Quarterly Report

Source Name: Indiana Dimension
Source Address: 13th and Vine, Jasper, Indiana 47547
Mailing Address: P.O. Box 270, Jasper, Indiana 47547-0270
Part 70 Permit No.: T037-6036-00104
Facility: One (1) wood chair spray booth - emission unit 457
Parameter: VOC
Limit: 39.6 tons per twelve (12) consecutive month period

Year: _____

Month	VOC usage this month (tons/month)	VOC usage previous 12 months (tons/12month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____

Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Indiana Furniture Industries
Source Address: 1224 Mill Street, Jasper, Indiana 47547
Mailing Address: P.O. Box 270, 1224 Mill Street, Jasper, Indiana 47547-0270
Part 70 Permit No.: T037-6036-00104
Facility: One (1) 7 MMBtu per hour wood/coal fired boiler, EU 107
Parameter: PM
Limit: The input coal to the boiler is limited to 141.61 tons per month.
The input wood to the boiler is limited to 257.41 tons per month.
For every one (1) ton of wood used the coal limit shall be reduced by 1.8 tons.

Year: _____

Month	Coal input (ton/month)	Wood input (ton/month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____

Signature: _____
Date: _____
Phone: _____

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Title V Quarterly Report

Source Name: Indiana Dimension
Source Name: Indiana Furniture Industries
Source Address: Indiana Dimension: 13th and Vine, Jasper, Indiana 47547
Source Address: Indiana Furniture: 1224 N. Mill Street, Jasper, Indiana 47547
Mailing Address: P.O. Box 270, 1224 N. Mill Street, Jasper, Indiana 47547-0270
Part 70 Permit No.: T037-6036-00104
Facility: One (1) 7 MMBtu per hour coal fired boiler and one (1) 5 MMBtu per hour coal fired boiler
Parameter: Sulfur Dioxide (SO₂)
Limit: 6.0 pounds per million Btu heat input each

Months: _____ Year: _____

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

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____

Signature: _____
Date: _____

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

PART 70 OPERATING PERMIT Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Indiana Dimension
 Source Name: Indiana Furniture Industries
 Source Address: Indiana Dimension: 13th and Vine, Jasper, Indiana 47547
 Source Address: Indiana Furniture: 1224 N. Mill Street, Jasper, Indiana 47547
 Mailing Address: P.O. Box 270, 1224 N. Mill Street, Jasper, Indiana 47547-0270
 Part 70 Permit No.: T037-6036-00104
 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 COMPLIANCE MONITORING REPORT**

Source Name: Indiana Dimension
 Source Name: Indiana Furniture Industries
 Source Address: Indiana Dimension: 13th and Vine, Jasper, Indiana 47547
 Source Address: Indiana Furniture: 1224 N. Mill Street, Jasper, Indiana 47547
 Mailing Address: P.O. Box 270, 1224 N. Mill Street, Jasper, Indiana 47547-0270
 Part 70 Permit No.: T037-6036-00104

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: Indiana Furniture Industries
Source Name: Indiana Dimension
Source Location: Indiana Furniture Industries: 1224 Mill Street, Jasper, Indiana 47547
Source Location: Indiana Dimension: 13th and Vine Street, Jasper, Indiana 47547
County: Dubois County
SIC Code: 2511
Operation Permit No.: T037-6036-00104
Permit Reviewer: Karen Purtell

The Office of Air Management (OAM) has reviewed the Part 70 permit applications from Indiana Furniture Industries and Indiana Dimension relating to the operation of wood furniture manufacturing plants.

Source Definition

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

- (1) Plant 1 - Indiana Furniture Industries is located at 1224 Mill Street, Jasper, Indiana 47547; and
- (2) Plant 2 - Indiana Dimension is located at 13th and Vine Street, Jasper, Indiana 47547.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. The plant ID for the two sources has been changed to 037-00104. Indiana Furniture Industries was previously called Indiana Desk and had plant ID number 037-00027. Indiana Dimension was originally called Indiana Chair with plant ID number 037-00036. In 1986, Indiana Chair changed its name to Indiana Cabinet #2 with a plant ID number 037-00068. In 1993, Indiana Cabinet #2 was changed to Indiana Dimension.

Permitted Emission Units and Pollution Control Equipment

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

Indiana Furniture Industries Plant

- (a) Ten (10) wood desk surface coating booths, consisting of the following:
 - (1) One (1) glaze booth, identified as emission unit number 145, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID# 12.

- (2) One (1) SAP booth, identified as emission unit number 225, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID#3.
 - (3) One (1) NGR booth, identified as emission unit number 227, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #4.
 - (4) One (1) washcoat booth, identified as emission unit number 228, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID# 5.
 - (5) One (1) wipestain booth, identified as emission unit number 229, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #6.
 - (6) One (1) sealer booth, identified as emissions unit number 230, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #7.
 - (7) One (1) first lacquer booth, identified as emission unit number 232, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #8.
 - (8) One (1) downdraft booth, identified as emission unit number 233, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters. One self contained sanding booth and a flash off booth labeled as stacks 9A and 9B.
 - (9) One (1) trim line booth, identified as emission unit number 234, with a maximum rating of 23 desks per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent ID #11.
 - (10) One (1) off-line booth, identified as emission unit number 438, with a maximum rating of 23 desks per hour.
- (b) Woodworking operations with particulate matter controlled by a baghouse and exhausted through stack/vent ID #1.
 - (c) One (1) wood/coal fired boiler, identified as emission unit 107, with a maximum rating of 200 horsepower per hour (7 MMBtu per hour), using a cyclone as control and exhausted to stack/vent ID #2.

Indiana Dimension Plant

- (a) One (1) wood chair surface coating booth, identified as emission unit number 457, with a maximum rating of 7.5 chairs per hour. Emissions shall be controlled by dry filters, then exhausted at stack/vent #2.
- (b) Woodworking operations with particulate matter controlled by a baghouse and exhausted through stack/vent ID #3.

- (c) One (1) wood/coal fired boiler, identified as emission unit 300, with a maximum rating of 150 horsepower per hour, using a cyclone as control and exhausted to stack/vent ID #1.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

New Emission Units and Pollution Control Equipment Requiring ENSR

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

Insignificant Activities

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

Indiana Furniture Industries:

- (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 exceed 2,000,000 Btu per hour.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Closed loop heating and cooling systems.
- (f) Infrared cure equipment.
- (g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (h) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Paved and unpaved roads and parking lots with public access.
- (k) Asbestos abatement projects regulated by 326 IAC 14-10.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) On-site fire and emergency response training approved by the department.

Indiana Dimension:

- (a) 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.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access.
- (g) Asbestos abatement projects regulated by 326 IAC 14-10.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) On site fire and emergency response training approved by the department.

Existing Approvals

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

- (a) Indiana Dimension - CP 037-2052, issued on July 14, 1992.
- (b) Indiana Furniture Industries - OP 19-06-90-0280, issued on November 17, 1986.
- (c) Indiana Furniture Industries - OP 19-06-90-0279, issued on November 17, 1986.
- (d) Indiana Furniture Industries - EQ 037-9075, issued on October 13, 1997
- (e) Indiana Furniture Industries - EQ 037-9597, issued on April 7, 1998.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on June 3, 1996.

A notice of completeness letter was mailed to the source on May 12, 1997.

Emission Calculations

See Appendix A, page 1 through 5 of this document for detailed emissions calculations.

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	less than 100
PM-10	less than 100
SO ₂	greater than 100, less than 250
VOC	greater than 250
CO	less than 100
NO _x	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)
Methanol	greater than 10
Toluene	less than 10
2-Butane	less than 10
Xylene	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC and sulfur dioxide are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 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.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	3.077
PM-10	0.001
SO ₂	4.052
VOC	46.889
CO	3.226
NO _x	1.361
Methanol	12.28

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 ₂	VOC	CO	NO _x	HAPs
wood/coal fired boiler - Indiana Furniture Industries	5.2	---	---	---	---	---	---
woodworking operation - Indiana Furniture Industries	5.4	---	---	---	---	---	---
surface coating Booth #457 Indiana Dimension Plant	---	---	---	39.6	---	---	---
woodworking operation - Indiana Dimension Plant	0.4	---	---	---	---	---	---
wood/coal fired boiler - Indiana Dimension Plant	9.0	---	---	---	---	---	---
Total Emissions	20.0	---	---	39.6	---	---	---

County Attainment Status

The source is located in Dubois County.

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

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

Federal Rule Applicability

40 CFR 60, Subpart Dc

The 10 MMBtu per hour natural gas boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc). However, the only requirements under 40 CFR 60.40, Subpart Dc, for natural gas is recording of the daily fuel consumption.

40 CFR 60, Subpart Dc

The 200 Horsepower (7 MMBtu) per hour wood/coal fired boiler is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc) because it was constructed in 1935, which predates the applicability date of the rule.

40 CFR 60, Subpart Dc

The 150 Horsepower (5 MMBtu) per hour wood/coal fired boiler is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc) because it was constructed in 1936, which predates the applicability date of the rule.

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 solids.
 - (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 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 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, 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 thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5, the fugitive particulate matter emissions shall be controlled according to the plan submitted for Indiana Furniture Industries on October 15, 1997. The plan consists of:

- (a) Applying water to the unpaved parking lot;
- (b) Posting six (6) five mile per hour speed limit signs with two at each entry;

- (c) The wood scrap infeed system for the boiler will be shut down when the new gas fired boiler is implemented into the process. The wood scrap infeed system will only be used as a backup means for providing wood for the boiler.

State Rule Applicability - surface coating booths - Indiana Furniture Industries Plant

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-1-2, particulate matter emissions from each of the ten (10) spray booths, EU 145, 225, 227, 228, 229, 230, 232, 233, 234, and 438 shall not exceed 0.03 grains per dry standard cubic foot. Compliance with this rule is demonstrated by using dry filters for overspray control.

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the wood chair surface coating booth, emission unit number 233, shall utilize one of the following application methods:

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

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

There are no VOC limits in this rule applicable to surface coating booths EU 145, 225, 227, 228, 229, 230, 232, 234 and 438 since the booths were constructed prior to 1973., which predates the applicability date of both 326 IAC 8-1-6 and 326 IAC 8-6.

State Rule Applicability - woodworking operation -Indiana Furniture Industries Plant

326 IAC 6-1-9 (Dubois County)

Pursuant to 326 IAC 6-1-9, the particulate matter emissions from the woodworking operations shall be limited to 5.4 tons per year. (Although the source is currently operating under the name Indiana Furniture, 326 IAC 6-1-9 lists the source's original name, Indiana Desk.)

Pursuant to Operation Permit number 19-06-90-0280, issued on November 17, 1986, in lieu of a stack test, the particulate matter emissions from the woodworking operations shall be considered in compliance with 326 IAC 6 provided that the visible emissions do not exceed 10% opacity.

State Rule Applicability - wood/coal fired boiler - Indiana Furniture Industries Plant

326 IAC 6-1-9 (Dubois County)

Pursuant to 326 IAC 6-1-9 (Nonattainment area particulate limitations: Dubois County), the particulate matter emissions from the 200 horsepower (7 MMBtu) per hour heat input boiler shall be limited to 0.6 pounds per million Btu heat input and 5.2 tons per year. The input coal to the boiler shall be limited to 141.61 tons per month. The input wood to the boiler shall be limited to 257.41 tons per month. For every one (1) ton of wood used the coal limit shall be reduced by 1.8 tons. (Although the source is currently operating under the name Indiana Furniture, 326 IAC 6-1-9 lists the source's original name, Indiana Desk.)

326 IAC 7-1.1-1 (Sulfur Dioxide (SO₂))

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the 200 horsepower (7MMBtu) per hour wood/coal fired boiler shall not exceed six (6.0) pounds per million Btu heat input.

The boiler is in compliance with this rule.

State Rule Applicability - natural gas fired boiler - Indiana Furniture Industries Plant

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Emission Limitations 326 IAC 6-1-2)

Pursuant to 326 IAC 6-1-2, particulate matter emissions from the 10 MMBtu per hour natural gas boiler shall not exceed 0.01 grains per dry standard cubic foot.

State Rule Applicability - insignificant Activities - Indiana Furniture Industries Plant and Indiana Dimension Plant

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-1-2, particulate matter emissions from the insignificant brazing, soldering and welding equipment and the cutting torches shall not exceed 0.03 grains per dry standard cubic foot.

State Rule Applicability - surface coating booth - Indiana Dimension Plant

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the wood chair surface coating booth, emission unit number 457, shall utilize one of the following application methods:

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

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

326 IAC 2-2 (PSD Minor Limit)

Pursuant CP 037-2052, issued on July 14, 1992, the wood chair surface coating booth, emission unit number 457, shall be limited to 39.6 tons per twelve consecutive month period. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Emission Limitations 326 IAC 6-1-2)

Pursuant to 326 IAC 6-1-2, particulate matter emissions from spray booth emission unit number 457, shall not exceed 0.03 grains per dry standard cubic foot. Compliance with this rule is demonstrated by using dry filters for overspray control.

State Rule Applicability - woodworking Operations - Indiana Dimension Plant

326 IAC 6-1-9 (Dubois County)

Pursuant to 326 IAC 6-1-9, particulate matter emissions from the woodworking operations shall not exceed 0.4 tons per year. (Although the source is currently operating under the name Indiana Dimension, 326 IAC 6-1-9 lists the source's original name, Indiana Chair.)

The woodworking operation is in compliance with this rule.

State Rule Applicability -Wood/coal fired boiler - Indiana Dimension Plant

326 IAC 6-1-9 (Dubois County)

Pursuant to 326 IAC 6-1-9 (Nonattainment area particulate limitations: Dubois County), the particulate matter emissions from the 150 horsepower (5MMBtu) per hour heat input boiler shall be limited to 0.6 pounds per million Btu heat input and 9 tons per year. (Although the source is currently operating under the name Indiana Dimension, 326 IAC 6-1-9 lists the source's original name, Indiana Chair.)

The boiler is in compliance with this rule.

326 IAC 7-1.1-1 (Sulfur Dioxide (SO₂))

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the 150 horsepower (5 MMBtu) per hour wood/coal fired boiler shall not exceed six (6.0) pounds per million Btu heat input.

The boiler is in compliance with this rule.

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 response steps and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate response steps within a specific time period.

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

- (1) The eleven (11) spray booths, emission units 145, 225, 227, 228, 229, 230, 232, 233, 234, 438 and 457, 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 dry filters, daily observations shall be made of the overspray 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 stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Emission Limitations).

- (2) The woodworking operations have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the woodworking baghouses 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.
- (f) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations. All defective bags shall be replaced.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-1-9 (Particulate Matter).

- (3) The 200 Horsepower (7 MMBtu) per hour and 150 Horsepower (5 MMBtu) per hour wood/coal fired boilers have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the wood/coal fired boilers cyclone stack 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.
 - (f) The sulfur content, heat content, fuel consumed and ash content must be monitored and recorded on a monthly basis. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-2.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-1-9 (Particulate Matter) and 326 IAC 7-1 (Sulfur dioxide emission limitations).

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 furniture manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T037-6036-00027.

Indiana Furniture Industries and Indiana Dimension
Jasper, Indiana
Permit Reviewer: Karen Purtell

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Calculations

326 IAC 6-1-9 (Particulate Matter) - Woodworking Operations

The woodworking operation from Indiana Furniture is limited to 5.4 tons per year.

Grain loading = 0.0002357 gr/ft³
Collection efficiency of baghouse = 97.82%
Total Filter Area = 8775 ft²
Air/cloth ratio = 5.9 (ft³/min)/ft²
7000 gr = 1 pound

Emission rate = (0.0002357 gr/ft³)(5.9 (ft³/min)/ft²)(60 min/hr)(8775 ft²)(#/7000 gr) = 0.10 #/hr

0.10 #/hr = 0.4 ton/yr = (0.4 ton/yr)/(1-.9782) = 18.3 tons/yr

The baghouse is needed for the woodworking operation to be in compliance with 326 IAC 6-1-9.

The woodworking operation from Indiana Dimension is limited to 0.4 tons per year.

Grain loading = 0.0002357 gr/ft³
Collection efficiency of baghouse = 99%
Total Filter Area = 8775 ft²
Air/cloth ratio = 5.9 (ft³/min)/ft²
7000 gr = 1 pound

Emission rate = (0.0002357 gr/ft³)(5.9 (ft³/min)/ft²)(60 min/hr)(8775 ft²)(#/7000 gr) = 0.10 #/hr

0.10 #/hr = 0.4 ton/yr = (0.4 t/y)/(1-0.99) = 40 tons per year.

The baghouse is needed for the woodworking operation to be in compliance with 326 IAC 6-1-9.

326 IAC 6-1-9 (Particulate Matter) - Coal/wood fired boilers with cyclones for control.

The Cyclones have an efficiency of 61.75%

The PM emissions from the wood/coal fired boiler for Indiana Furniture Industries is limited to 0.6 pounds per MMBtu per hour and 5.2 tons per year.

For Wood:

$$(16.89 \text{ tons/yr})(\text{yr}/8760 \text{ hr})(2000\#/\text{ton})(\text{hr}/7\text{MMBtu}) = 0.55 \text{ pounds per MMBtu}$$

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

$$(16.89 \text{ tons/yr}) (1-0.6175) = 6.46 \text{ tons per year}$$

The boiler is not in compliance with the 5.2 tons per year limit, therefore the wood input will be limited to 257.41 tons per month to ensure compliance with the 5.2 tons per year limit and the cyclone must be in operation at all times.

$$(5.2 \text{ T/Y})(\text{T}/8.8\#)(2000\#/\text{T})/(1-.6175) = 3089 \text{ tons of wood per year} = 257.41 \text{ tons per month}$$

$$3089 \text{ tons of wood} = 13.6 \text{ tons per year PM emissions}$$

$$13.6 \text{ tons} (1-.6175) = 5.2 \text{ tons per year PM emission}$$

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Jasper, Indiana
Permit Reviewer: Karen Purtell

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For Coal:

$$(20.5 \text{ tons/yr})(\text{yr}/8760 \text{ hr})(2000\#/\text{ton})(\text{hr}/7\text{MMBtu}) = 0.668 \text{ pounds per MMBtu}$$

$$(0.668 \text{ \#/MMBtu})(1-0.6175) = 0.255 \text{ pounds per MMBtu.}$$

The cyclone must be in operation for the boiler to be in compliance with the 0.6 pounds per MMBtu per hour limit.

$$(20.5 \text{ tons/yr})(1-0.6175) = 7.84 \text{ tons per year}$$

The boiler is not in compliance with the 5.2 tons per year limit, therefore the coal input will be limited to 141.61 tons per month to ensure compliance with the 5.2 tons per year limit and the cyclone must be in operation at all times.

$$(5.2 \text{ T/Y})(\text{T}/16\#)(2000\#/\text{T})/(1-.6175) = 1699.34 \text{ tons of coal per year} = 141.61 \text{ tons per month}$$

$$1699.34 \text{ tons of coal} = 13.6 \text{ tons per year PM emissions}$$

$$13.6 \text{ tons} (1-.6175) = 5.2 \text{ tons per year PM emission}$$

$$\frac{16 \text{ \#/ ton coal}}{8.8 \text{ \#/ton wood}} = \frac{???}{1 \text{ ton of wood}} = 1.8 \text{ ton of coal}$$

For every one (1) ton of wood used the coal limit shall be reduced by 1.8 tons.

The PM emissions from the wood/coal fired boiler for Indiana Dimension Plant is limited to 0.6 pounds per MMBtu per hour and 9 tons per year.

For Wood:

$$(12.05 \text{ tons/yr})(\text{yr}/8760 \text{ hr})(2000\#/\text{ton})(\text{hr}/5\text{MMBtu}) = 0.55 \text{ pounds per MMBtu}$$

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

$$(12.05 \text{ tons/yr}) (1-0.6175) = 4.6 \text{ tons per year}$$

The cyclone must be in operation for the boiler to be in compliance with the 9 tons per year limit.

For Coal:

$$(15.6 \text{ tons/yr})(\text{yr}/8760 \text{ hr})(2000\#/\text{ton})(\text{hr}/5\text{MMBtu}) = 0.712 \text{ pounds per MMBtu}$$

$$(0.712 \text{ \#/MMBtu})(1-0.6175) = 0.272 \text{ pounds per MMBtu.}$$

The cyclone must be in operation for the boiler to be in compliance with the 0.6 pounds per MMBtu per hour limit.

$$(15.6 \text{ tons/yr})(1-0.6175) = 5.967 \text{ tons per year}$$

The cyclone must be in operation for the boiler to be in compliance with the 9 tons per year limit.

326 IAC 7-1.1-1 (Sulfur Dioxide)

The boilers are limited to 6.0 pounds per MMBtu heat input.

The heating value of the coal = 0.011936 MMBtu/lb

The emission factor for coal = 38

$$(6.0\#/MMBtu)(0.011936\text{MMBtu/lb})(2000 \text{ lb/ton})(\text{ton}/38) = 3.76\% \text{ sulfur}$$

The sulfur content of the coal is 2.5%, therefore the boilers are in compliance.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Indiana Furniture Industries, Plant ID 037-00027
Source Name: Indiana Dimension, Plant ID 037-00068
Source Location: Indiana Furniture: 1224 Mill Street, Jasper, Indiana 47547
Source Location: Indiana Dimension: 13th and Vine Street, Jasper, Indiana 47547
County: Dubois
SIC Code: 2511
Operation Permit No.: T037-6036-00104
Permit Reviewer: Karen Purtell

On July 1, 1998, the Office of Air Management (OAM) had a notice published in The Herald, Jasper, Indiana, stating that Indiana Furniture Industries and Indiana Dimension 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 August 4, 1998, Indiana Furniture Industries, 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:

It was determined that the new gas fired 200 HP (6.7 MMBtu per hour) boiler would be exempt from further permitting. Please incorporate this new boiler into our Title V permit.

Response to Comment 1:

The 6.7 MMBtu per hour natural gas fired boiler has been added to Condition D.4 of the final Title V permit. The potential emissions from the 6.7 MMBtu per hour natural gas fired boiler are exemption level.

Comment 2:

Condition C.6. The permit states that we shall not allow fugitive dust to escape beyond the property line or boundaries of the property. We think this rule will be very difficult to follow since there are many times when the weather conditions will make this law very difficult to control.

Response to Comment 2:

Under 326 IAC 6-4-6(6), fugitive dust from a source caused by adverse meteorological conditions is an exception to this requirement and will not result in a violation. There have been no changes resulting from this comment.

Comment 3:

Section C.10(f). The permit states that prior to a renovation/demolition that we have an inspector thoroughly inspect the area for asbestos. We would like to have the ability to determine if an inspector is needed because there could be areas of renovation that we know for certain that it does not contain asbestos.

Response to Comment 3:

Renovation is defined in 326 IAC 14-10-2(38) as altering a facility or a component of a facility in any way. All areas where renovation or demolition are going to occur must be inspected by an accredited asbestos inspector. The language in the permit is the same as the Federal language in 40 CFR 61, Subpart M.

Not every renovation must be reported. If the Permittee's renovation will involve stripping, removing or disturbing two hundred-sixty (260) linear feet on pipes, one hundred-sixty (160) square feet on other facility components; or a total of thirty-five (35) cubic feet on all facility components or more of friable asbestos, then the Permittee must notify IDEM using an IDEM notification form at least ten (10) working days prior to renovation.

Demolition is defined as removing supporting beams, walls, or structures of a facility. 326 IAC 14-10-1(a)(1) states that the Permittee must properly notify IDEM of every demolition project, even if no asbestos is present. There have been no changes resulting from this comment.

Upon further review, OAM has made the following changes to the final Part 70 permit:

1. Condition B.14(b) (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

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

(b) ~~The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.~~ **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:

2. Condition B.27 (Credible Evidence)
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.

3. Condition C.1, Major Source, has been deleted from the permit.

4. C.2 Opacity [326 IAC 5-1]

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty-four (24) consecutive readings,~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.

- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) ~~as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor~~ in a six (6) hour period.

5. The following condition has been as Conditions D.1.1 and D.5.1 to the final permit:

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

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

6. Condition D.1.4 has been changed as follows:

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), **with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations**, the surface coating applied to the wood chair surface coating booth, emission unit number 233, shall utilize one of the following application methods:

7. Conditions D.1.11 and D.5.12 (Monitoring) and Conditions D.1.12(c) and D.5.13(d) (Record Keeping Requirements) have been changed as follows:

D.1.11 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 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in 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.1.12 Record Keeping Requirements

- (c) To document compliance with Condition D.2.9 and D.2.10, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, ~~daily~~ and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

8. Condition D.2.2, Opacity, has been deleted from the permit.

9. Conditions D.2.7 and D.6.7 have been changed as follows:

D.2.7 Broken or Failed Bag or Failure Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **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).~~

10. Conditions D.3.6 and D.7.6 has been replaced with the following condition:

~~D.3.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]~~

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

- (a) **Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:**
- (1) **The name of the coal supplier; and**
 - (2) **The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and**
 - (3) **The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and**

- (4) The methods used to determine the properties of the coal; or**
- (b) Sampling and analyzing the coal by using one of the following procedures:**
 - (1) Minimum Coal Sampling Requirements and Analysis Methods:**
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;**
 - (B) Coal shall be sampled at least one (1) time per day;**
 - (C) Minimum sample size shall be five hundred (500) grams;**
 - (D) Samples shall be composited and analyzed at the end of each calendar quarter;**
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or**
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or**
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]**

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

11. Condition D.3.8 and D.7.8 (Record keeping) has been changed as follows:

D.3.8 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1 and D.3.2 the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(5)** below. **Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.3.1 and D.3.2**

~~(1) The sulfur content~~

~~(2) Heat content~~

~~(3) Fuel consumption~~

~~(4) Ash content~~

- ~~_____ (5) Sulfur dioxide emission rate~~
- ~~_____ (6) If fuel supplier certification is used to demonstrate compliance, the following, at a minimum shall be maintained:~~
 - ~~_____ (a) Fuel supplier certification;~~
 - ~~_____ (b) The name of the fuel supplier; and~~
 - ~~_____ (c) A statement from the fuel supplier that certifies the sulfur content of the coal.~~

- (1) Calendar dates covered in the compliance determination period; and**
- (2) Actual coal usage since last compliance determination period; and**
- (3) Sulfur content, heat content, and ash content; and**
- (4) Sulfur dioxide emission rates; and**
- (5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.**

- (b) To document compliance with Condition D.3.5 and D.3.7, the Permittee shall maintain records of visible emissions notations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

12. The "individual" source reporting forms at the end of the permit have been combined into "combined" source reporting forms.