

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

**Woodcrest Manufacturing, Inc.
150 East Washington Street
Peru, Indiana 46970**

(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.: T103-6056-00027	
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: Walter B. Woodhams
Source Address: 150 East Washington Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
SIC Code: 2512
County Location: Miami
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) surface coating line, designated as SC1, coating wood furniture with a maximum capacity of 107.5 units per hour, consisting of the following equipment:
 - (1) One (1) flowcoating booth, identified as EU-02D, and exhausting to Stack ID S-02D.
 - (2) One (1) spray booth, identified as EU-02F, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02F.
 - (3) One (1) spray booth, identified as EU-02G, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02G.
 - (4) One (1) spray booth, identified as EU-02H, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02H.
- (b) One (1) surface coating line, designated as SC2, coating wooden furniture with a maximum capacity of 18.74 units per hour, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-02A, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-02I, and exhausting to general ventilation.

- (3) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.
 - (4) One (1) spray booth, identified as EU-02M, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02M.
- (c) One (1) surface coating line, designated as SC3, coating wooden furniture, consisting of the following equipment:
- (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
 - (3) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.
- (d) Woodworking operations consisting of the following:
- (1) Line W-1, with a maximum capacity of 4050 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (2) Line W-2, with a maximum capacity of 1416 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (3) Line W-3, with a maximum capacity of 1789 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (4) Line W-4, with a maximum capacity of 654 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (5) Line W-5, with a maximum capacity of 3152 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1 or one (1) six bag portable collector, exhausting to Stack ID BH-1 or general ventilation, respectively; and
 - (6) Line W-6, with a maximum capacity of 2684 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (One (1) boiler, with a heat input capacity of 1.5 MMBtu/hr).
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Petroleum hydrocarbon degreaser, with a throughput of 0.6 gallons per day).
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

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

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

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the 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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

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

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

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

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

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

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 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.

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

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

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

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

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

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

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

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

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

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

The Permittee:

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

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

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

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

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

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

C.13 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]

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- (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 quarterly or semi-annual 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 and 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

Facility Description [326 IAC 2-7-5(15)] The following surface coating equipment:

- (a) One (1) surface coating line, designated as SC1, coating wood furniture with a maximum capacity of 107.5 units per hour, consisting of the following equipment:
 - (1) One (1) flowcoating booth, identified as EU-02D, and exhausting to Stack ID S-02D.
 - (2) One (1) spray booth, identified as EU-02F, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02F.
 - (3) One (1) spray booth, identified as EU-02G, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02G.
 - (4) One (1) spray booth, identified as EU-02H, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02H.
- (b) One (1) surface coating line, designated as SC2, coating wooden furniture with a maximum capacity of 18.74 units per hour, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-02A, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-02I, and exhausting to general ventilation.
 - (3) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.
 - (4) One (1) spray booth, identified as EU-02M, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02M.
- (c) One (1) surface coating line, designated as SC3, coating wooden furniture, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
 - (3) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture in lines SC1, SC2 and SC3 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.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP-103-2222-00027, issued on January 22, 1992, coating line SC1 (EU-02D, EU-02F, EU-02G and EU-02H) shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) Coating line SC2 (EU-02A, EU-02I, EU-02C and EU-02M) shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (c) Pursuant to CP-103-8824-00027, issued on November 18, 1997, coating line SC3 (EU-BB, EU-02N, EU-X) shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the five (5) paint booths (EU-02F, EU-02G, EU-02H, EU-02C and EU-02M) shall not exceed the pound per hour emission rate established as E in the following formula:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

A copy of this rule is enclosed.

D.1.5 Work Practice Standards [40 CFR 63.803]

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

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

D.1.6 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 these facilities and their control devices.

Compliance Determination Requirements

D.1.7 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) 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 Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 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.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 Particulate Matter (PM)

Pursuant to CP-103-2222-00027, CP-103-4481-00027 and CP-103-8824-00027, issued on January 22, 1992, April 24, 1995 and November 18, 1997, respectively, the dry filters for PM control shall be in operation at all times when the five (5) paint booths (EU-02F, EU-02G, EU-02H, EU-02C and EU-02M) are in operation.

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

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 observations shall be made of the overspray from the booth stacks while the associated booth is 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.

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.1.2, 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 VOC usage limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.
 - (1) Certified Product Data Sheet for each finishing material and thinner.

- (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials.
- (3) The VHAP content in weight percent of each thinner used.
- (4) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.11, the Permittee shall maintain a log of daily overspray observations, daily and weekly 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.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) An Initial Compliance Report to document compliance with Condition D.1.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar 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.1.4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, 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.2 FACILITY OPERATION CONDITIONS

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

- (a) Line W-1, with a maximum capacity of 4050 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
- (b) Line W-2, with a maximum capacity of 1416 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
- (c) Line W-3, with a maximum capacity of 1789 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
- (d) Line W-4, with a maximum capacity of 654 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
- (e) Line W-5, with a maximum capacity of 3152 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1 or one (1) six bag portable collector, exhausting to Stack ID BH-1 or general ventilation, respectively; and
- (f) Line W-6, with a maximum capacity of 2684 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-1 shall not exceed 14.7 pounds per hour when Lines W-1 through W-6 operate at their maximum process weight rates.
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the six bag portable collector shall not exceed 1.18 pounds per hour when Line W-5 operates at a process weight rate of 3152 pounds per hour.
- (c) The pounds per hour limitations were calculated with the following equation:

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

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

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 these facilities and their control devices.

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 Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

Pursuant to CP-103-2222-00027 and CP-103-4481-00027, issued on January 22, 1992 and April 24, 1995, respectively, the baghouse BH-1 and six bag portable collector for PM control shall be in operation at all times when the associated facilities are in operation and exhausting to the outside atmosphere.

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 stack BH-1 exhaust shall be performed during normal daylight operations when exhausted 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 Bag or Failure Detection

In the event that bag failure has been observed:

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

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, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust (BH-1).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 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.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (One (1) boiler, with a heat input capacity of 1.5 MMBtu/hr).
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Petroleum hydrocarbon degreaser, with a throughput of 0.6 gallons per day).
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Boiler

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

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 1.5 MMBtu per hour heat input boiler shall be limited to six-tenths (0.6) pounds per MMBtu heat input.

Compliance Determination Requirements

D.3.2 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 PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Degreasing Operation

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

D.3.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Halogenated Solvent Cleaning NESHAP [326 IAC 20-6-1] [40 CFR 63.460]

The owner or operator of the degreasing facility shall not use any cleaning agent containing the following halogenated HAPs, or any combination in a total concentration greater than five percent (5%) by weight:

- (a) methylene chloride (CAS No. 75-09-2),
- (b) perchloroethylene (CAS No. 127-18-4),
- (c) trichloroethylene (CAS No. 79-01-6),
- (d) 1,1,1 - trichloroethane (CAS No. 71-55-6),
- (e) carbon tetrachloride (CAS No. 56-23-5), and
- (f) chloroform (CAS No. 67-66-3).

This limitation will ensure that the requirements of 40 CFR 63.460 (Halogenated Cleaning Solvent NESHAP) do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [26 IAC 2-7-19]

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of the HAP content of each cleaning material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type used.

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

Process Weight Activities

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

D.3.6 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the insignificant woodworking equipment shall not exceed allowable PM emission rate based on the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.3.7 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 Condition D.3.6 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: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-6056-00027

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: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-6056-00027

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 Quarterly Report

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-6056-00027
Facility: Surface Coating Line SC1 (EU-02D, EU-02F, EU-02G and EU-02H)
Parameter: VOC
Limit: Less than 250 tons per 12 consecutive month period

YEAR: _____

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

- 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: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-6056-00027
Facility: Surface Coating Line SC2 (EU-02A, EU-02I, EU-02C and EU-02M)
Parameter: VOC
Limit: Less than 250 tons per 12 consecutive month period

YEAR: _____

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

- 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: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-6056-00027
Facility: Surface Coating Line SC3 (EU-BB, EU-X and EU-02N)
Parameter: VOC
Limit: Less than 40 tons per 12 consecutive month period

YEAR: _____

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

- 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 Semi-Annual Report

Source Name: Woodcrest Manufacturing, Inc.
 Source Address: 150 East Washington Street, Peru, Indiana 46970
 Mailing Address: P.O. Box 848, Peru, Indiana 46970
 Part 70 Permit No.: T103-6056-00027
 Facility: Surface coating booths
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations - 1.0 lbs VHAP/lb solids
 (2) Thinners used for on-site formulation of washcoats, basecoats, and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lbs VHAP/lb solid
 (5) All other contact adhesives - 1.0 lb VHAP/lb solid
 (6) Strippable spray booth material - 0.8 lb VOC/lb solid

YEAR: _____

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

- 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 OPERATING PERMIT
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Woodcrest Manufacturing, Inc.
 Source Address: 150 East Washington Street, Peru, Indiana 46970
 Mailing Address: P.O. Box 848, Peru, Indiana 46970
 Part 70 Permit No.: T103-6056-00027

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

<p>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".</p>		
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>		
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>		
Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: Woodcrest Manufacturing, Inc.
Source Location: 150 E. Washington St., Peru, Indiana 46970
County: Miami
SIC Code: 2512
Operation Permit No.: T103-6056-00027
Permit Reviewer: Bryan Sheets

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Woodcrest Manufacturing, Inc. relating to the operation of a wood furniture manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) surface coating line, designated as SC1, coating wood furniture with a maximum capacity of 107.5 units per hour, consisting of the following equipment:
 - (1) One (1) flowcoating booth, identified as EU-02D, and exhausting to Stack ID S-02D.
 - (2) One (1) spray booth, identified as EU-02F, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02F.
 - (3) One (1) spray booth, identified as EU-02G, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02G.
 - (4) One (1) spray booth, identified as EU-02H, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02H.

- (b) One (1) surface coating line, designated as SC3, coating wooden crate beds, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
 - (3) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.

- (c) Woodworking operations consisting of the following:
- (1) Line W-1, with a maximum capacity of 4050 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (2) Line W-2, with a maximum capacity of 1416 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (3) Line W-3, with a maximum capacity of 1789 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (4) Line W-4, with a maximum capacity of 654 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (5) Line W-5, with a maximum capacity of 3152 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1 or one (1) six bag portable collector, exhausting to Stack ID BH-1 or general ventilation, respectively; and
 - (6) Line W-6, with a maximum capacity of 2684 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of an unpermitted surface coating line, designated as SC2, coating wooden chests with a maximum capacity of 18.74 units per hour, consisting of the following equipment:

- (a) One (1) dip tank, identified as EU-02A, and exhausting to general ventilation.
- (b) One (1) dip tank, identified as EU-02I, and exhausting to general ventilation.
- (c) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.

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

The application includes information relating to the change in coatings from a water borne topcoat to a solvent based stain, for the following equipment:

- (a) One (1) spray booth, identified as EU-02M, utilizing an air assisted airless application system, coating wood furniture with a maximum capacity of 18.74 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02M.

This booth will be included with the previously identified unpermitted facilities in the surface coating line, designated as SC2.

Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (1.5MMBtu/hr boiler).
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Existing Approvals

The source has been operating under the following approvals:

- (1) Construction permit CP-103-2222-00027, issued on January 22, 1992;
- (2) Construction permit CP-103-8824-00027, issued on November 18, 1997; and
- (2) Registration letter CP-103-4481-00027, issued on April 24, 1995.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
 - (1) One (1) stain dip tank, identified as EU-02A, coating wood furniture with a maximum capacity of 18.74 units per hour, and exhausting to general ventilation.
 - (2) One (1) stain dip tank, identified as EU-02I, coating wood furniture with a maximum capacity of 18.74 units per hour, and exhausting to general ventilation.
 - (3) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on June 4, 1996. Additional information was received on September 11, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Part 70 Review

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	> 100
PM-10	> 100
SO ₂	< 100
VOC	> 100
CO	< 100
NO _x	< 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)
Xylenes	> 10
Toluene	> 10
Methyl Isobutyl Ketone	> 10
Methanol	> 10
Formaldehyde	< 10
TOTAL	> 25

- (a) The potential emissions (as defined in the Indiana Rule) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

New Source Review

Source Status

Source PSD, Part 70 or FESOP Definition in 1993 after surface coating line SC1, woodworking equipment, and boiler were constructed (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	76.6
PM10	76.6
SO ₂	negligible
VOC	237.2
CO	0.13
NO _x	0.80

- (a) The existing source was a minor source because no attainment pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the previous construction permit (CP-103-2222) issued to the source on January 22, 1992.

Proposed Modification

PTE from the modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Unpermitted Equipment	0.31	0.31	0	228	0	0
PSD Level	250	250	250	250	250	250

- (a) The modification to an existing minor stationary source was not major because the emission increase was less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements did not apply.
- (b) The input VOC to EU-02M will be included with the limit of 228 tons/year assigned to the coating line designated as SC2. Therefore, the PSD requirements of 326 IAC 2-2 do not apply.
- (c) Source PSD, Part 70 or FESOP Definition in 1993 after surface coating line SC2 was constructed (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	76.9
PM10	76.9
SO ₂	negligible
VOC	465.2
CO	0.13
NO _x	0.80

These emissions were used as the Existing Source PSD Definition for CP-103-8824 issued on November 18, 1997.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects 1996 emission data for the HAPs and 1995 data for all other pollutants.

Pollutant	Actual Emissions (tons/year)
PM	< 10
PM-10	< 10
SO ₂	0
VOC	156.0
CO	0
Total HAPs	44.7
NO _x	0

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units. The VOC emissions from surface coating lines SC1, SC2, and SC3 have been limited to 237.2, 228 and 36 tons per year, respectively to avoid PSD review. This will also limit the HAP and PM emissions from the surface coating booths. Particulate matter overspray is controlled by dry filters. The woodworking equipment is controlled by a baghouse.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Coating Line SC1	4.03	4.03	0	237.2	0	0	77.2
Coating Line SC2	0.31	0.31	0	228	0	0	55.9
Coating Line SC3	0.10	0.10	0	36	0	0	0
Woodworking	69.6	69.6	0	0	0	0	0
Total Emissions	74.0	74.0	0	501.2	0	0	133.1

Attached Tables 1 through 5 summarize the permit conditions and requirements

County Attainment Status

The source is located in Miami County.

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

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

Part 70 Permit Conditions

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

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The 1.5 MMBtu/hr natural gas-fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the heat input capacity of the boiler is less than 10 MMBtu/hr. There are no other New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) The surface coating facilities are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart JJ). A copy of the rule is attached.
- (c) The degreasing station is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-6-1 (40 CFR 63, Subpart T) because the solvents listed in 40 CFR 63.460(a) are not used.

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 one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 4-1 (Open Burning)

Pursuant to 326 IAC 4-1-2, the applicant shall not open burn any material, except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

326 IAC 5-1 (Visible Emissions Limitations)

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability - Surface Coating

Coating Line SC1:

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to CP 103-2222-00027, Woodcrest Manufacturing has accepted a limit on the potential to emit volatile organic compounds (VOC) from this surface coating line. The input of VOC to the coating applicators shall be limited to 237.2 tons per year, based on a twelve month total rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules will not apply.

Coating Line SC2:

326 IAC 2-2 (Prevention of Significant Deterioration)

These booths were constructed in 1993. At that time, the source was considered minor for purposes of PSD. The potential VOC emissions from these booths are 502 tons per year. This line will be limited to 228 (11/12 of 249 due to monthly rolling limit) tons per year to avoid PSD rules. The addition of EU-01M (using a solvent based stain) into this line shall be included in the limit.

Coating Line SC3:

326 IAC 2-2 (Prevention of Significant Deterioration)

These booths will be constructed in 1997. Since Woodcrest is defined as a major PSD source, the line must be limited to 36 (11/12 of 39 due to monthly rolling limit) tons per year to avoid PSD rules.

All Surface Coating Lines:

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

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

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

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

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) overspray from the surface coating booths shall be limited by the following:

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

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

State Rule Applicability - Woodworking Equipment

326 IAC 6-3-2 (Process Operations)

For the purposes of determining allowable emission rates for the woodworking equipment, the combination of equipment exhausting to a baghouse will be considered a separate process. The process weight rates for the separate lines were combined to calculate the allowable emission rate. Since a portion of Line W-5 has emissions exhausted to two different baghouse systems, the process weight rate for the line was split based on the percentage of air flow rate to each baghouse.

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through Stack ID BH-1 shall not exceed 14.7 pounds per hour when Lines W-1 through W-6 operate at their maximum process weight rates. Since the potential controlled emissions are 0.42 pounds per hour, these process lines can comply with 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through the six bag portable collector shall not exceed 1.18 pounds per hour when Line W-5 operates at a process weight rate of 3152 pounds per hour. Since the potential controlled emissions are 0.05 pounds per hour, this process can comply with 326 IAC 6-3-2.

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

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

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

State Rule Applicability - Natural gas-fired Boiler

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions from the natural gas-fired boiler (EU-02) shall not exceed six-tenths (0.6) pounds per million Btu (lbs/MMBtu). The emissions factor for the boiler is 0.012 lbs/MMBtu. Therefore, the boiler can comply with 326 IAC 6-2-4.

State Rule Applicability - Degreasing

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The cold cleaner degreasing operation, which was constructed in 1988, shall comply with the requirements of 326 IAC 8-3-2. The other requirements of this rule do not apply because of construction date or type of degreasing operation.

State Rule Applicability - Insignificant Woodworking

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the insignificant woodworking equipment shall be limited by the following:

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

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

Compliance Requirements

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

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The spray booths 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 while one or more of the booths are in operation. 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 Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

The woodworking equipment has applicable compliance monitoring conditions as specified below:

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

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

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this wood furniture manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T103-6056-00027**.

Table 1

Description of facility: Surface Coating Line SC1 (EU-02D, EU-02F, EU-02G and EU-02H)
Max Rating: 107.5 units per hour
Construction Date: 1992
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: S-02D through S-02H, respectively.

Facility class:		Description: Surface coating of wood furniture		
EMISSION LIMITATIONS				
	PM	VOC	VOC	HAPs
Numerical Emission Limit:	Use of dry filters for overspray control	237.2 tons VOC per 12 month period	Use specified application methods	1.0 lb VHAP/lb solids
Regulation/Citation:	326 IAC 6-3-2	326 IAC 2-2	326 IAC 8-2-12	40 CFR 63.800 (NESHAP - Subpart JJ)
Compliance Demonstration:	Visible Emissions	Record Keeping	Record Keeping	Volume Weighted Average
PERFORMANCE TESTING				
NA				
COMPLIANCE MONITORING				
Monitoring Description:	Visible Emissions Notations	NA	NA	NA
Monitoring Method:	NA	NA	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	NA	NA	NA
Monitoring Frequency:	Daily and Weekly	NA	NA	NA
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Total VOC Emissions	NA	(1) A Certified Product Data Sheet for each finishing material and thinner. (2) VHAP content of each finishing material and thinner. (3) Copies of the averaging calculations and work practice implementation plan as required in 40 CFR 63.806(e).
Recording Frequency:	Daily and Weekly	Monthly	NA	NA
REPORTING REQUIREMENTS				
Information in Report:	NA	Total VOC Emissions	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.
Reporting Frequency/Submittal:	NA	Quarterly	NA	(1) The Initial Compliance Report must be submitted within 60 days following the compliance date of November 21, 1997. (2) The Continuous Compliance Demonstration Report must be submitted every six months.
Additional Comments:	NA	NA	NA	NA

Table 2

Description of facility: Surface Coating Line SC2 (EU-02A, EU-02I, EU-02C and EU-02M)
Max Rating: 18.74 units per hour
Construction Date: 1993
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: General ventilation, S-02C and S-02M, respectively.

Facility class:		Description: Surface coating of wood furniture			
EMISSION LIMITATIONS		PM	VOC	VOC	HAPs
Numerical Emission Limit:	Use of dry filters for overspray control	228 tons VOC per 12 month period	Use specified application methods	1.0 lb VHAP/lb solids	
Regulation/Citation:	326 IAC 6-3-2	326 IAC 2-2	326 IAC 8-2-12	40 CFR 63.800 (NESHAP - Subpart JJ)	
Compliance Demonstration:	Visible Emissions	Record Keeping	Record Keeping	Volume Weighted Average	
PERFORMANCE TESTING		NA			
COMPLIANCE MONITORING					
Monitoring Description:	Visible Emissions Notations	NA	NA	NA	
Monitoring Method:	NA	NA	NA	NA	
Monitoring Regulation/Citation:	326 IAC 2-7-5	NA	NA	NA	
Monitoring Frequency:	Daily and Weekly	NA	NA	NA	
RECORD KEEPING					
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Total VOC Emissions	NA	(1) A Certified Product Data Sheet for each finishing material and thinner. (2) VHAP content of each finishing material and thinner. (3) Copies of the averaging calculations and work practice implementation plan as required in 40 CFR 63.806(e).	
Recording Frequency:	Daily and Weekly	Monthly	NA	NA	
REPORTING REQUIREMENTS					
Information in Report:	NA	Total VOC Emissions	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.	
Reporting Frequency/Submittal:	NA	Quarterly	NA	(1) The Initial Compliance Report must be submitted within 60 days following the compliance date of November 21, 1997. (2) The Continuous Compliance Demonstration Report must be submitted every six months.	
Additional Comments:	NA	NA	NA	NA	

Table 3

Description of facility: Surface Coating Line SC3 (EU-BB, EU-X, and EU-02N)
Max Rating: 16.25 units per hour
Construction Date: 1997
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: General ventilation and S-01

Facility class:		Description: Surface coating of wood furniture			
EMISSION LIMITATIONS		PM	VOC	VOC	HAPs
Numerical Emission Limit:	Use of dry filters for overspray control	36 tons VOC per 12 month period	Use specified application methods	1.0 lb VHAP/lb solids	
Regulation/Citation:	326 IAC 6-3-2	326 IAC 2-2	326 IAC 8-2-12	40 CFR 63.800 (NESHAP - Subpart JJ)	
Compliance Demonstration:	Visible Emissions	Record Keeping	Record Keeping	Volume Weighted Average	
PERFORMANCE TESTING		NA			
COMPLIANCE MONITORING					
Monitoring Description:	Visible Emissions Notations	NA	NA	NA	
Monitoring Method:	NA	NA	NA	NA	
Monitoring Regulation/Citation:	326 IAC 2-7-5	NA	NA	NA	
Monitoring Frequency:	Daily and Weekly	NA	NA	NA	
RECORD KEEPING					
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Total VOC Emissions	NA	(1) A Certified Product Data Sheet for each finishing material and thinner. (2) VHAP content of each finishing material and thinner. (3) Copies of the averaging calculations and work practice implementation plan as required in 40 CFR 63.806(e).	
Recording Frequency:	Daily and Weekly	Monthly	NA	NA	
REPORTING REQUIREMENTS					
Information in Report:	NA	Total VOC Emissions	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.	
Reporting Frequency/Submittal:	NA	Quarterly	NA	(1) The Initial Compliance Report must be submitted within 60 days following the compliance date of November 21, 1997. (2) The Continuous Compliance Demonstration Report must be submitted every six months.	
Additional Comments:	NA	NA	NA	NA	

Table 5

Description of facility: A portion of Line W-5
Max Rating: 3152 pounds per hour
Construction Date: Unknown
Control Device (if any): One (1) portable six bag collector
Stack/Vent ID: General Ventilation

Facility class: Description: **Woodworking**

EMISSION LIMITATIONS		PM
Numerical Emission Limit:	1.18 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	Visible Emissions and Record Keeping	
PERFORMANCE TESTING		NA
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emissions Notations	Baghouse Inspections
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	326 IAC 2-7-5
Monitoring Frequency:	Daily and Weekly	Quarterly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Bag Integrity
Recording Frequency:	Daily and Weekly	Quarterly
REPORTING REQUIREMENTS		
Information in Report:	NA	NA
Reporting Frequency/Submittal:	NA	NA
Additional Comments:	NA	NA

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

Addendum to the
Technical Support Document for Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Name:	Woodcrest Manufacturing, Inc.
Source Location:	150 East Washington Street, Peru, Indiana 46970
County:	Miami
SIC Code:	2512
Operation Permit No.:	T103-6056-00027
Permit Reviewer:	Bryan Sheets

On January 8, 1998, the Office of Air Management (OAM) had a notice published in the Peru Daily Tribune, Peru, Indiana, stating that Woodcrest Manufacturing, Inc. had applied for a Part 70 Operating Permit to operate a wood furniture manufacturing operation. 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 February 10, 1998, Woodcrest Manufacturing, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Although Woodcrest currently paints wood chests and wood crates in surface coating lines SC2 and SC3, respectively, Woodcrest would request that the description of the equipment be changed such that Woodcrest has the flexibility to paint other types of wood furniture.

Response to Comment 1:

The OAM agrees that describing the type of wood furniture painted in surface coating lines SC2 and SC3 is unnecessarily restrictive. Both lines have coating usage limits which should allow painting any size wood furniture without affecting the allowable emissions. Therefore, the wording will be changed to state that these lines paint wooden furniture.

Comment 2:

Woodcrest would like to request that the permit condition D.1.4 be changed to state that any of the methods defined in 40 CFR 63.804(a) may be used to achieve compliance with the Wood Furniture NESHAP.

Response to Comment 2:

The OAM agrees that the source should have the option of using any compliance method stated in 40 CFR 63.804(a). Subpart (b) of Condition D.1.4 (Wood Furniture NESHAP) will be changed to include the other options. See change number 37 following these comments.

Comment 3:

The TSD states that 2 dip tanks and one spray booth, currently existing at Woodcrest, were constructed and operated without the proper permit.

Construction permit CP-103-2222 allowed for the construction of 2 flow coaters. Instead, of installing the 2nd flow coater, Woodcrest installed the 2 dip tanks which did not increase allowable or actual emissions from the permitted flow coater.

Construction permit CP-103-2222 also allowed for the construction of four spray booths. Three of the four spray booths were constructed within one month of issuance of the permit. However, one of the booths (listed in the TSD) was constructed after the allotted 18 months for construction. Woodcrest simply failed to ask for an extension.

Response to Comment 3:

The state rules do not allow sources to switch equipment without going through a permit review. Although Woodcrest believes that actual and/or allowable emissions do not increase from the permitted flow coater, there is no permit to federally enforce the allowable limit for the new equipment. In addition, there are certain state rules based on potential emissions. If the new equipment allows the source to potentially increase emissions, it is possible that certain rules which did not apply before, will apply to the new equipment. The same thing applies to equipment constructed after the 18 month deadline. The deadline is there to ensure that equipment is constructed in a reasonable time without allowing sources to avoid rules that may apply to newer equipment, or to ensure that the attainment status of the county has not changed since the equipment was originally permitted.

Regardless of the reasons, the fact remains that these facilities were constructed and operated without a proper permit. It is the Permit Section's responsibility to refer these matters to OAM's Compliance Section where it will be determined whether the situation should be referred to the Office of Enforcement (OE).

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

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

2. The descriptions of equipment in subsections (b) and (c) of Condition A.2 have been changed to indicate that Woodcrest has the ability to paint more than just wooden chests and crates in surface coating lines SC2 and SC3.
 - (b) One (1) surface coating line, designated as SC2, coating wooden ~~chests~~ **furniture** with a maximum capacity of 18.74 units per hour, consisting of the following equipment:
 - (c) One (1) surface coating line, designated as SC3, coating wooden ~~crate beds~~ **furniture**, consisting of the following equipment:
3. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.
4. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.
 - (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."**
5. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
 - (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**
6. Condition B.11 (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

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

- (a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than 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 and 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 the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

7. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

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 units and associated~~ emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (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.
8. Condition B.14 (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]

- (a) **This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- ~~(a)~~ (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 either of the following:~~
 - (1) The applicable requirements are included and specifically identified in this permit; **or**
 - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

- ~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. 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.~~
- ~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, 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. 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.~~
- ~~(d)~~ **(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.
- ~~(e)~~ **(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).
- ~~(f)~~ **(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)]
- ~~(g)~~ **(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)]

9. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

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.

- ~~(b)~~ (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).**
- ~~(c)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

10. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :

- (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).**

11. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:

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

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

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

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

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

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

12. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

~~B.26~~ B.24 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (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]**
13. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.
 - (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).**
14. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

~~B.28~~ **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, ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
 - (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
 - (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~
15. Condition B.28 (Credible Evidence) is a new condition. U.S. EPA stated that it would object to any permit that did not address the use of credible evidence. It reads as follows:

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

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

16. Condition C.1 (Major Source) is revised to change to include the reference to the federal rule.

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, this source is a major source.

17. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

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

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

18. Condition C.2 (now renumbered C.3) (Opacity) has been revised to clarify that the rule is federally enforceable.

~~E.2~~ **C.3 Opacity [326 IAC 5-1]**

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 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.

~~This condition is not federally enforceable.~~

19. Condition C.3 (now renumbered C.4) (Open Burning) has been revised to clarify what portion of the rule is federally enforceable.

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

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

20. Condition C.4 (now renumbered C.5) (Incineration) has been revised to clarify that the rule is federally enforceable.

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

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

21. Condition C.5 (now renumbered C.6) (Fugitive Dust Emissions) has been revised to clarify what portion of the rule is federally enforceable.

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

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

22. Condition C.6 (now renumbered C.7) (Operation of Equipment) has been revised to clarify the requirement.

~~C.6~~ **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. ~~as described in Section D of this permit.~~

23. Condition C.7 (now re-numbered C.8) (Stack Height) has been revised to clarify the requirement.

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

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

~~(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.~~

24. Conditions C.8 (Asbestos Abatement Projects-Accreditation) and C.13 (Asbestos Abatement Projects) have been combined into one new condition C.9 (Asbestos Abatement Projects).

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.

25. Condition C.9 (now re-numbered C.10) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

~~C.9~~ C.10 Performance Testing ~~[326 IAC 3-2-1]~~ [326 IAC 3-6]

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

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 ~~before~~ **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).

26. Condition C.10 (now re-numbered C.11) (Compliance Schedule) has been revised to more closely match the rule language.

~~C.10~~ **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** ~~Will continue to comply with such requirements that become effective during the term of this permit, and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

27. Condition C.11 (now re-numbered C.12) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

~~C.11~~ **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 shall** notifies:

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

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

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

28. Condition C.12 (now re-numbered as C.13) (Monitoring Methods) has been revised to clarify the requirement.

~~C.12~~ **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.

29. Condition C.14 (Emergency Reduction Plans) has been revised to clarify that the plan does not require a certification by a responsible official.

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. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
- (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]

30. Condition C.15 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

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).

31. Condition C.16 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]
[326 IAC 2-7-6] [326 IAC 1-6]

32. Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test) is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

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).

33. Condition C.18 (a) has been revised to clarify the certification requirement for the emission statement.

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 ~~certified~~, 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:

34. Condition C.20 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

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

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

35. Condition C.21 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

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.**
- (a) (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
- (b) (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.
- (c) (d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) (e) All instances of deviations **as described in Section B - Deviations from Permit Requirements and Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit, or~~
- (2) ~~An emergency as defined in 326 IAC 2-7-1(12); or~~
- (3) ~~Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
- (4) ~~Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

- ~~(e)~~ (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- ~~(f)~~ (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).

36. Condition D.1.2 (PSD Minor Limit) has been revised to clarify the OAM’s change in policy regarding monthly rolling limits. Due to recent EPA guidance, the OAM no longer requires sources to accept a limit equivalent to 11/12ths of the full limit if monthly rolling limits are requested instead of daily rolling.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP-103-2222-00027, issued on January 22, 1992, coating line SC1 (EU-02D, EU-02F, EU-02G and EU-02H) shall use ~~no more less than 237.2~~ **250** tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21** not applicable.
- (b) ~~Pursuant to 326 IAC 2-2,~~ Coating line SC2 (EU-02A, EU-02I, EU-02C and EU-02M) shall use ~~no more less than 228~~ **250** tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21** not applicable.
- (c) Pursuant to CP-103-8824-00027, issued on November 18, 1997, coating line SC3 (EU-BB, EU-02N, EU-X) shall use ~~no more less than 36~~ **40** tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21** not applicable.

37. Condition D.1.4 (Wood Furniture NESHAP) has been revised to clarify that the source has more than one option to comply with the Wood Furniture NESHAP.

D.1.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations ~~by achieving a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids.~~ **as follows:**

- (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; **or**
 - (B) **Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or**
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; **or**
 - (D) Use a combination of (A), (B), and (C).
- (2) **Limit VHAP emissions contact adhesives as follows:**
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) **The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.**

A copy of this rule is enclosed.

38. Condition D.1.7 (Testing Requirements) has been revised to clarify the testing requirements for the Wood Furniture NESHAP.

D.1.7 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)(1) or~~ **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 ~~3-2-1 3-6~~. ~~If the Permittee elects to demonstrate compliance using 63.804(a)(2), no performance testing is required.~~

- (b) ~~However, if the OAM requests, compliance with the limits specified in Condition D.1.3 shall be determined by performance tests conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6. 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 Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

39. Condition D.1.8 (HAP Content) has been removed from the permit because the requirements are also specified in Condition D.1.13 (Reporting Requirements).
40. Condition D.1.8 (VOC Emissions) has been added to the permit to clarify how the Permittee shall demonstrate compliance with the VOC usage limits.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 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.

41. Condition D.1.11 (Monitoring) has been revised to clarify when overspray emissions should trigger response steps.

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 observations shall be made of the overspray **from the booth stacks** while ~~one or more of the associated booths are is~~ 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 **an a noticeable change in** overspray emission, **or** evidence of overspray emission, ~~or other abnormal emission~~ is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
42. Condition D.1.12(b) (Record Keeping Requirements) has been revised to clarify record keeping requirements when the average method is used to document compliance with the Wood Furniture NESHAP.

- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through ~~(3)~~ **(4)** below. Records maintained for (1) through ~~(3)~~ **(4)** shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.
- (1) Certified Product Data Sheet for each finishing material and thinner.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials.
 - (3) The VHAP content in weight percent of each thinner used.
 - (4) 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.**
43. Subsection (d) of Condition D.1.13 (Reporting Requirements) has been added to clarify where the Permittee is supposed to send the NESHAP reports.
- (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**
44. Condition D.2.3 (Testing Requirements) has been revised to clarify when the Permittee is required to test the facility.
-
- D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**
~~Testing of~~ **The Permittee is not required to test** these facilities ~~are not specifically required~~ 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 limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~
45. Condition D.2.5(a) (Visible Emission Notations) has been revised to clarify when visible emission notations are required.
- (a) Daily visible emission notations of the woodworking stack BH-1 exhaust shall be performed during normal daylight operations **when exhausted to the atmosphere.** A trained employee shall record whether emissions are normal or abnormal.

46. Condition D.2.6 (Baghouse Inspections) has been revised to clarify when baghouse inspections are required.

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.

47. Condition D.2.7 (Broken Bag or Failure Detection) has been revised to clarify what shall be done with single compartment baghouses.

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.**
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the ~~Preventive Maintenance Plan~~ **Compliance Response Plan** shall be initiated. For any failure with corresponding response steps and timetable not described in the ~~Preventive Maintenance Plan~~ **Compliance Response Plan**, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
48. Condition D.2.8(b) (Record Keeping Requirements) has been revised to clarify what records are required for baghouse inspections.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 **and the dates the vents are redirected.**

49. Condition D.3.2 (Testing Requirements) has been revised to clarify when the Permittee is required to test the facility.

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility are not specifically required~~ 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 Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

50. Condition D.3.7 (Testing Requirements) has been revised to clarify when the Permittee is required to test the facility.

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility are not specifically required 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 Condition D.3.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

51. The Certification Form is revised to clarify which forms require a certification.
52. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.
53. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.
54. The VOC usage Quarterly Report Forms have been updated to clarify the new limits.
55. The semi-annual NESHAP Report Form has been updated to clarify the thinner limits.

HAP Emission Calculations

Company Name: Woodcrest Manufacturing, Inc.
 Plant Location: 150 E. Washington St., Peru, Indiana
 County: Miami
 Permit Reviewer: Bryan Sheets
 Date: 08/11/97

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Methyl Isobutyl Ketone	Weight % Methanol	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Methanol Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Total Emissions (ton/yr)
Line SC1:																
Unit ID EU-02D																
Kwik Dry 66	6.56	0.134700	107.47	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
W.C. Hazewood Stain	7.34	0.025600	107.47	78.10%	18.45%	0.00%	0.00%	0.00%	0.00%	69.08	16.32	0.00	0.00	0.00	0.00	85.40
Unit ID EU-02F																
Lacquer Sealer	7.56	0.067800	107.50	0.00%	50.00%	0.00%	5.00%	5.00%	0.00%	0.00	120.67	0.00	12.07	12.07	0.00	144.81
Unit ID EU-02G																
Gloss Varnish	7.61	0.079700	107.50	0.00%	19.08%	0.70%	0.00%	0.00%	0.00%	0.00	54.49	2.00	0.00	0.00	0.00	56.49
Unit ID EU-02H (Operating Scenario #1)																
Gloss Varnish	7.61	0.079700	107.50	0.00%	19.08%	0.70%	0.00%	0.00%	0.00%	0.00	54.49	2.00	0.00	0.00	0.00	56.49
Unit ID EU-02H (Operating Scenario #2)																
G.W. Borne Enamel	9.03	0.140800	107.50	0.22%	0.00%	0.00%	0.00%	0.00%	2.98%	1.32	0.00	0.00	0.00	0.00	17.84	19.16
B.W. Borne Enamel	8.75	0.151600	107.50	0.22%	0.00%	0.00%	0.00%	0.00%	3.15%	1.37	0.00	0.00	0.00	0.00	19.67	21.05
R.W. Borne Enamel	8.66	0.079700	107.50	0.00%	0.00%	0.00%	0.00%	0.00%	5.08%	0.00	0.00	0.00	0.00	0.00	16.51	16.51
Subtotal										70.45	245.97	4.00	12.07	12.07	19.67	343.18
Line SC3:																
Unit ID EU-02N																
Provincial Oil Stain	6.7	0.152560	8.13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID BB																
Provincial Oil Stain	6.7	0.060345	16.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID X																
Provincial Oil Stain	6.7	0.129672	6.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal										0.00	0.00	0.00	0.00	0.00	0.00	0.00
Line SC2:																
Unit ID EU-02A																
W.C. Hazewood Stain	7.34	0.044000	18.74	78.10%	18.45%	0.00%	0.00%	0.00%	0.00%	20.70	4.89	0.00	0.00	0.00	0.00	25.59
Kwik Dry 66	6.56	0.231000	18.74	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID EU-02M																
W.C. Hazewood Stain	7.34	0.044000	18.74	78.10%	18.45%	0.00%	0.00%	0.00%	0.00%	20.70	4.89	0.00	0.00	0.00	0.00	25.59
Kwik Dry 66	6.56	0.231000	18.74	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID EU-02I																
W.C. Hazewood Stain	7.34	0.044000	18.74	78.10%	18.45%	0.00%	0.00%	0.00%	0.00%	20.70	4.89	0.00	0.00	0.00	0.00	25.59
Kwik Dry 66	6.56	0.231000	18.74	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID EU-02C																
Gloss Varnish	7.61	0.064000	18.74	0.00%	19.08%	0.70%	0.00%	0.00%	0.00%	0.00	7.63	0.28	0.00	0.00	0.00	7.91
Lacquer Sealer	7.56	0.057000	18.74	0.00%	50.00%	0.00%	5.00%	5.00%	0.00%	0.00	17.69	0.00	1.77	1.77	0.00	21.22
Subtotal										62.11	39.99	0.28	1.77	1.77	0.00	105.91

Total State Potential Emissions **132.56 285.95 4.28 13.84 13.84 19.67 449.09**

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

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

Company Name: Woodcrest Manufacturing, Inc.
Address City IN Zip: 150 E. Washington St., Peru, Indiana
Permit No.: T103-6056
Pit ID: 103-00027
Reviewer: Bryan Sheets
Date: 08/11/97

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Line SC1:																
Unit ID EU-02D																
Kwik Dry 66	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	0.134700	107.47	6.56	6.56	94.96	2279.13	415.94	0.00	ERR	100%
W.C. Hazewood Stain	7.34	97.40%	0.0%	97.4%	0.0%	1.00%	0.025600	107.47	7.15	7.15	19.67	472.06	86.15	0.00	714.92	100%
Unit ID EU-02F																
Lacquer Sealer	7.56	73.15%	0.0%	73.2%	0.0%	20.80%	0.067800	107.50	5.53	5.53	40.31	967.35	176.54	16.20	26.59	75%
Unit ID EU-02G																
Gloss Varnish	7.61	63.86%	0.0%	63.9%	0.0%	27.66%	0.079700	107.50	4.86	4.86	41.64	999.29	182.37	25.80	17.57	75%
Unit ID EU-02H (Operating Scenario #1)																
Gloss Varnish	7.61	63.86%	0.0%	63.9%	0.0%	27.66%	0.079700	107.50	4.86	4.86	41.64	999.29	182.37	25.80	17.57	75%
Unit ID EU-02H (Operating Scenario #2)																
G.W. Borne Enamel	9.03	59.84%	48.1%	11.7%	52.1%	33.31%	0.140800	107.50	2.22	1.06	16.05	385.10	70.28	60.10	3.18	75%
B.W. Borne Enamel	8.75	61.56%	49.1%	12.5%	51.6%	32.63%	0.151600	107.50	2.25	1.09	17.77	426.43	77.82	60.02	3.34	75%
R.W. Borne Enamel	8.66	64.81%	51.3%	13.5%	53.3%	30.63%	0.079700	107.50	2.51	1.17	10.02	240.58	43.91	28.59	3.82	75%
Subtotal											238.21	5717.12	1043.38	102.11		
Line SC3:																
Unit ID EU-02N																
Provincial Oil Stain	6.7	78.90%	0.0%	78.9%	0.0%	16.30%	0.152560	8.13	5.29	5.29	6.56	157.36	28.72	1.92	32.43	75%
Unit ID BB																
Provincial Oil Stain	6.7	78.90%	0.0%	78.9%	0.0%	16.30%	0.060345	16.25	5.29	5.29	5.18	124.41	22.70	0.00	32.43	100%
Unit ID X																
Provincial Oil Stain	6.7	78.90%	0.0%	78.9%	0.0%	16.30%	0.129672	6.25	5.29	5.29	4.28	102.82	18.77	0.00	32.43	100%
Subtotal											16.02	384.59	70.19	1.92		
Line SC2:																
Unit ID EU-02A																
W.C. Hazewood Stain	7.34	97.40%	0.0%	97.4%	0.0%	1.00%	0.044000	18.74	7.15	7.15	5.89	141.48	25.82	0.00	714.92	100%
Kwik Dry 66	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	0.231000	18.74	6.56	6.56	28.40	681.55	124.38	0.00	ERR	100%
Unit ID EU-02M																
W.C. Hazewood Stain	7.34	97.40%	0.0%	97.4%	0.0%	1.00%	0.044000	18.74	7.15	7.15	5.89	141.48	25.82	0.17	714.92	75%
Kwik Dry 66	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	0.231000	18.74	6.56	6.56	28.40	681.55	124.38	0.00	ERR	75%
Unit ID EU-02I																
W.C. Hazewood Stain	7.34	97.40%	0.0%	97.4%	0.0%	1.00%	0.044000	18.74	7.15	7.15	5.89	141.48	25.82	0.00	714.92	100%
Kwik Dry 66	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	0.231000	18.74	6.56	6.56	28.40	681.55	124.38	0.00	ERR	100%
Unit ID EU-02C																
Gloss Varnish	7.61	63.86%	0.0%	63.9%	0.0%	27.66%	0.064000	18.74	4.86	4.86	5.83	139.89	25.53	3.61	17.57	75%
Lacquer Sealer	7.56	73.15%	0.0%	73.2%	0.0%	20.80%	0.057000	18.74	5.53	5.53	5.91	141.77	25.87	2.37	26.59	75%
Subtotal											114.61	2750.74	502.01	6.16		

State Potential Emissions

Add worst case coating to all solvents

368.85

8852.45

1615.57

110.19
x (1 - 0.95)
5.51

due to dry filters

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (lbs/gal) * (1 - Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
Woodworking

Company Name: Woodcrest Manufacturing, Inc.
City, Indiana: 150 E. Washington St., Peru, Indiana
Reviewer: Bryan Sheets
Date: 09/15/97
OP No.: T103-6056-00027

A. Allowable Emissions

1. Stack BH-1 - Controlled by one baghouse

There are six separate lines (W-1 through W-6) exhausting to Stack BH-1 which is controlled by one baghouse. The process weigh rates from the six lines will be combined to establish a single limit. Since Line W-5 has emissions exhausted to two separate baghouses, the process weight rates from the equipment exhausting to each control will be based on the percentage of air flow to each control.

	Process Weight Rates (lbs/hr)	
	BH-1	Portable
Line W-1	4050	
Line W-2	1416	
Line W-3	1789	
Line W-4	654	
Line W-5	2837	315
Line W-6	2684	

Pursuant to 326 IAC 6-3-2, the PM emissions from Stack BH-1 shall not exceed an amount determined by the following equation:

$$E = 4.10 * (P)^{0.67}, \quad \text{where } E = \text{allowable emission rate in lbs/hr}$$

$$P = \text{process weight rate in tons/hr} = 6.72$$

$$E = 4.10 * (6.72)^{0.67}$$

$$E = 14.7 \text{ lbs/hr}$$

Pursuant to 326 IAC 6-3-2, the PM emissions from the portable baghouse shall not exceed an amount determined by the following equation:

$$E = 4.10 * (P)^{0.67}, \quad \text{where } E = \text{allowable emission rate in lbs/hr}$$

$$P = \text{process weight rate in tons/hr} = 0.158$$

$$E = 4.10 * (0.158)^{0.67}$$

$$E = 1.19 \text{ lbs/hr}$$

B. Potential Controlled Emissions

To demonstrate compliance with these limits, potential controlled emissions from the stacks will be determined as follows:

1. Stack BH-1 - Controlled by one cyclone and one baghouse

Amount entering exhaust system from Line W-1 = 635.15 lbs/hr
 Amount entering exhaust system from Line W-2 = 221.76 lbs/hr
 Amount entering exhaust system from Line W-3 = 279.90 lbs/hr
 Amount entering exhaust system from Line W-4 = 103.35 lbs/hr
 Amount entering exhaust system from Line W-5 = 90% * 493.05 lbs/hr = 443.75
 Amount entering exhaust system from Line W-6 = 419.85 lbs/hr
 Total amount entering exhaust system = 2103.76 lbs/hr
 Collection efficiency of the cyclone and baghouse = 99.98%

$$\text{Amount collected} = 0.9998 * 2103.76 \text{ lbs/hr}$$

$$\text{Amount collected} = 2103.34 \text{ lbs/hr}$$

$$\text{After control emissions} = \text{Amount entering baghouse} - \text{amount collected}$$

Appendix A: Emission Calculations
Woodworking

Company Name: Woodcrest Manufacturing, Inc.
City, Indiana: 150 E. Washington St., Peru, Indiana
Reviewer: Bryan Sheets
Date: 09/15/97
OP No.: T103-6056-00027

$$\text{After control emissions} = 2103.76 \text{ lbs/hr} - 2103.34 \text{ lbs/hr}$$

$$\text{After control emissions} = 0.42 \text{ lbs/hr}$$

The potential controlled emissions are well below the limit of 7.38 lbs/hr. Therefore, the baghouse can comply with 326 IAC 6-3-2.

2. Six-bag portable collector

Amount entering exhaust system from Line W-5 = 10% * 493.05 lbs/hr = 49.31
 Collection efficiency of the cyclone and baghouse = 99.9%

$$\text{Amount collected} = 0.999 * 49.31 \text{ lbs/hr}$$

$$\text{Amount collected} = 49.26 \text{ lbs/hr}$$

$$\text{After control emissions} = \text{Amount entering baghouse} - \text{amount collected}$$

$$\text{After control emissions} = 49.31 \text{ lbs/hr} - 49.26 \text{ lbs/hr}$$

$$\text{After control emissions} = 0.05 \text{ lbs/hr}$$

The potential controlled emissions are well below the limit of 0.16 lbs/hr. Therefore, the baghouse can comply with 326 IAC 6-3-2.

Boiler

A. Allowable Emissions

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the 1.5 MMBtu/hr boiler shall not exceed an amount determined by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where} \quad Pt = \text{allowable particulate matter emissions, lbs/MMBtu}$$

$$Q = \text{total source heat input capacity, MMBtu/hr}$$

$$Pt = \frac{1.09}{(1.5)^{0.26}}$$

$$Pt = 0.98 \text{ lbs/MMBtu}$$

However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lbs/MMBtu. Therefore, the boiler will be limited to 0.6 lbs/MMBtu. The emission factor for this boiler is 12.0 lbs/MMCF which is equivalent to 0.012lbs/MMBtu. Therefore, this boiler can comply with 326 IAC 6-2-4.