

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

**Swiss Plywood Corp.
102 Main Street
Tell City, Indiana 47586**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F123-6530-00007	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

A.1 General Information

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

Responsible Official: Mr. William Borders
Source Address: 102 Main Street, Tell City, IN 47586
Mailing Address: P.O. Box 8, Tell City, IN 47586-0008
SIC Code: 2434, 2511, 2517 and 2599
County Location: Perry
County Status: Attainment for all criteria pollutants
Source Status: Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary

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

- (a) Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with spray guns for wood furniture coating with baffles for overspray control.
- (b) Woodworking operations with two baghouses for particulate control, identified as E22a and E22b.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Lubricating oil storage.
- (b) Filing of storage drums.
- (c) Cleaners and solvents.
- (d) Water based adhesives.
- (e) Bag and filter replacement.
- (f) Paved and unpaved roads.
- (g) Line and vessel purging.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

- B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)
The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.
- B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning 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 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.
- B.3 Permit Term [326 IAC 2-8-4(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 13-5-5-3 (prior to July 1, 1996, IC 13-7-10-2.5), of the permit.
- B.4 Enforceability [326 IAC 2-8-6]
(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 2-8-9]
The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.
- B.6 Severability [326 IAC 2-8-4(4)]
(a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

(b) Indiana 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.
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(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 2-8-3(f)] [326 IAC 2-8-4(5)(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 also provide additional information as requested by IDEM, OAM, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).
- (c) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that the 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.
- (d) Upon written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

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

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) enforcement action;
 - (2) permit termination, revocation and reissuance or modification; and
 - (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.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

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.

A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work

practices. The certification shall be submitted April 15 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

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

- (b) This annual compliance certification report required by this permit shall be timely if:
- (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - (2) Delivered by any other method if it is received and stamped 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 continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period; and
 - (5) Such other facts as IDEM, OAM, may require to determine the compliance status of the source.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

- (a) The Permittee shall prepare, maintain and implement operation and Preventive Maintenance Plans as necessary including the following information on each:
- (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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;

- (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) Preventive Maintenance Plans shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provision [326 IAC 2-8-12]

- (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 as follows:
 - (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 describes 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 of this permit;
 - (4) The Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency occurrence by telephone or facsimile;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management) or,
Telephone No.: 317-233-5674
Facsimile No.: 317-233-5967
 - (5) The Permittee submitted written notice or by 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 shall fulfill the requirement of 326 IAC 2-8-4(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 326IAC 2-7-1(C)(33).

- (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 any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the preventive maintenance plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) the Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in clause (B) above.

- B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]
Deviations from requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any corrective actions 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.

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)]
[326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a 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 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner determines any of the following:
 - (1) That it 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 2-8-8(a)]
- (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 practical. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. 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(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-5-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. 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) Delivered by U. S. mail and postmarked on or before the date it is due; or
 - (C) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (2) If IDEM, OAM 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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application of Renewal [326 IAC 2-8-9]
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 2-8 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 needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the

requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).

- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.

B.22 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without 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) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of

total emissions);

- (3) 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, IL 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326IAC 2-7-1(C)(33). The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (4) 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review. Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

- (b) For each such 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.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7) and subject to the constraints in section (a) of this condition and those

in 326 IAC 2-8-15(d).

B.23 Construction Permit Requirement [326 IAC 2-1]

Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

B.24 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of IDEM 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 FESOP source is located or emissions related activity is conducted, or where records are 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 demonstrating compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit (326 IAC 2-8)
Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9 tons per 365 day period for any individual HAP or 24 tons per 365 day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.
- C.2 Opacity
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:
- (a) Visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings,
 - (b) Visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.
- C.3 Open Burning
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.
- C.4 Fugitive Dust Emissions
The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.
- C.5 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- (a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
 - (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
 - (c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

Compliance Monitoring [326 IAC 2-8-5(a)(1)]

C.6 Compliance Monitoring [326 IAC 2-8-4(3)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring 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 shall notify:

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

in writing, with full justification of the reasons for 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.

C.7 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, as appropriate, unless some other method is specified in this permit. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326IAC 2-7-1(C)(33).

C.8 Maintenance of Monitoring Equipment [326 IAC 1-6]

The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a break down of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Preventive maintenance plans for the monitors shall be implemented. In addition, prompt correction, as indicated, shall be initiated within the time frames specified, whenever the parameters monitored fall outside of the indicated values.

C.9 Pressure Gauge Specifications

Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

Corrective Actions [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.10 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the prescribed time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:

- (a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or
- (b) The Permittee has determined that the 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
- (c) An automatic measurement was taken when the process was not operating; or
- (d) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.11 Monitoring Data Availability

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. Records shall be kept of the times that the equipment is not operating. 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. 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. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5 percent of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.12 General Record Keeping Requirements

- (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 and available within one hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include:
 - (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:
- (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) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;
 - (5) Relevant work purchases orders;
 - (6) Quality assurance and quality control procedures;
 - (7) Operator's standard operating procedures;
 - (8) Manufacturer's specifications or their equivalent; and
 - (9) Equipment "troubleshooting" guidance.

C.13 General Reporting Requirements

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:
- (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

- (d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

SECTION D.1 FACILITY OPERATION CONDITIONS

Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with air-assisted airless spray guns for wood furniture coating with baffles for overspray control.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound

- (a) The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 8.0 tons per month. Therefore, the requirements of 326 IAC 2-7 (Part 70) will not apply.
- (b) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings applied to wood furniture and/or wood components shall utilize one or more 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 means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. High volume low pressure spray is an acceptable alternative application of air-assisted airless spray.

D.1.2 Hazardous Air Pollutants

That the hazardous air pollutant emissions shall be limited as follows:

- (a) The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to 0.75 tons per month.
- (b) The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to 2.0 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter Overspray

The baffles for particulate matter over spray control shall be in operation at all times when the paint booths are in operation. The facility shall comply with 326 IAC 6-3-2 (c). Use the equation

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

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.4 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

D.1.5 Monitoring

Daily inspections shall be performed to verify the placement, integrity and particle loading of the baffles. To document compliance with Condition D.1.3 observations shall be made daily of the overspray while at least one of the booths is 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 any other abnormal emission is observed.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.6 Volatile Organic Compound (VOC) Usage

That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The VOC content (**weight percent**) of each material used;
- (c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.

D.1.7 Hazardous Air Pollutant (HAP)

That the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The HAP content (**weight percent**) of each material used;

- (c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable;
- (d) Identification of the facility or facilities associated with the usage of each HAP.

D.1.8 Quarterly Reporting

That a quarterly summary to document compliance with operation conditions numbers D.1.1 and D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Woodworking operations with two baghouses for particulate control, identified as E22a and E22b.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

Pursuant to 326 IAC 2-8-4 (FESOP), the following conditions shall apply:

- (a) The baghouse shall be in operation at all times when the woodworking process is in operation, and shall not exceed the allowable particulate PM10 emission rate of 6.74 pounds per hour.

D.2.2 Particulate Matter less than ten microns

Pursuant to 326 IAC 2-8-4 (FESOP), the following conditions shall apply:

- (a) The cyclones and baghouse shall be in operation at all times when the woodworking process is in operation, and shall not exceed the allowable particulate PM10 emission rate of 6.74 pounds per hour.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.3 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

D.2.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling woodworking operations. All defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.

D.2.5 Visible Emission Observations

Visible emission notations of the woodworking stack exhaust shall be performed at least once per shift when the woodworking process is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shutdown 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 month and has been trained in the appearance and characteristics of normal visible emission from that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.6 Broken Bag or Failure Detection

That in the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the units have been

replaced.

- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.2.7 Dust Collector Operational Parameters

The Permittee shall take readings of the total static pressure drop across the baghouses controlling the woodworking operations at least once per day when the above stated facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of one (1) to seven (7) inches. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading. The instrument used for determining the pressure shall comply with subsection C.9 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

State Form 47738 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Swiss Plywood Corp.
Source Address: 102 Main St., Tell City, IN 47586
FESOP No.: F123-6530-00007

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

Please check what document is being certified:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Relocation Notification
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT
 (For Control Equipment Monitoring Only)

Source Name: Swiss Plywood Corp.
 Source Address: 102 Main St., Tell City, IN 47586
 FESOP No.: F123-6530-00007

If a deviation has occurred, a separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.

Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
9 Continuously	9 Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month day,year)	To:
9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT**

Source Name: Swiss Plywood Corp.
Source Address: 102 Main St., Tell City, IN 47586
FESOP No.: F123-6530-00007

If a deviation has occurred, a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb per day, 300 hours per yr, 5000 gallons per month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40 percent VOC in inks, 0.5 percent sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

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

FESOP Quarterly Report

Source Name: Swiss Plywood Corp.
Source Address: 102 Main St., Tell City, IN 47586
FESOP No.: F123-6530-00007
Facility: Total for entire plant.
Parameter: VOCs
Limit: 8.0 tons per month

Year: _____

Month	VOC Usage (tons per month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

FESOP Quarterly Report

Source Name: Swiss Plywood Corp.
Source Address: 102 Main St., Tell City, IN 47586
FESOP No.: F123-6530-00007
Facility: Total for entire plant.
Parameter: HAPs
Limit: 2.0 tons per month

Year: _____

Month	HAP Usage (tons per month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

**FESOP Quarterly Report
(To be completed for each single HAP)**

Source Name: Swiss Plywood Corp.
Source Address: 102 Main St., Tell City, IN 47586
FESOP No.: F123-6530-00007
Facility: Total for entire plant.
Parameter: Single HAP
Limit: 0.75 tons per month

Year: _____

Month	_____ Usage (tons per month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name: Swiss Plywood Corp.
Source Location: 102 Main Street, Tell City, IN 47586
County: Perry
Operation Permit No.: F123-6530-00007
Permit Reviewer: Warren E. McPhail

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Swiss Plywood Corp relating to the operation of a wood furniture and cabinet manufacturing plant.

The source consists of the following approvals (permits, registrations, exemptions, etc.) with the following emission units and pollution control devices:

- (a) Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28.

Each paint booth is equipped with air-assisted airless spray guns for wood furniture coating with baffles for over spray control.

- (b) Woodworking operations with a baghouse for particulate control, identified as E22.

The source also includes the following insignificant activities:

- (a) Lubricating oil storage.
- (b) Filing of storage drums.
- (c) Cleaners and solvents.
- (d) Water based adhesives.
- (e) Bag and filter replacement.
- (f) Paved and unpaved roads.
- (g) Line and vessel purging.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million

(10,000,000) British thermal units per hour.

Enforcement

There are no Enforcement actions pending.

Recommendation

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

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

A complete FESOP application for the purposes of this review was received on September 5, 1996.

Potential to Emit (PTE) Calculations

See Appendix A pages 1 and 2, Potential to Emit (PTE) Calculation, for detailed calculations.

Total PTE

PTE is defined as "the maximum capacity of a stationary source to emit a pollutant under its physical and operational design", [326 IAC 2-7-1(28)].

Pollutant	PTE (tons/year)
PM	1315
PM-10	657.5
SO ₂	0
VOC	590
CO	0
NO _x	0

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

HAP	PTE (tons/year)
Methanol	58.02
Methyl Chloroform	2.65
MEK	12.13
Ethyl Benzene	2.02
Methyl Isobutyl Ketone	7.58
Toluene	34.74
Glycol Ether	0.13
Xylene	8.85
1,2-Epoxybutane	0.13

1,4-Dioxane	0.13
TOTAL HAPs	126.4

The potential to emit (as defined in the Indiana Rule) of (pollutant) are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

A source with "potential to emit" high enough to make it a "major source" but whose actual emissions are below the Part 70 emission levels may elect to avoid the Part 70 Operating Permit Program by agreeing to accept a permit with federally enforceable limits that restrict its PTE to below the major source emission levels. The permit containing these restrictions is called a Federally Enforceable State Operating Permit (FESOP).

County Attainment Status

The source is located in Perry County.

Pollutant	Status (attainment or unclassifiable/severe, moderate, marginal, or maintenance nonattainment)
TSP	attainment
PM-10	attainment
SO ₂	attainment
Ozone	attainment
CO	attainment
NO ₂	attainment

Limited PTE

The source has accepted a federally enforceable VOC limit of 99 tons per year, consisting of approximately 2.0 tons per year for the insignificant activities and a federally enforceable PM limit of 99 tons per year, consisting of approximately 1.0 tons per year for the insignificant activities.

and

The source has accepted a limit of 9 tons per year for any single HAP and 24 tons per year for any combination of HAPs.

	<p>Limited PTE (tons/year)</p> <p>The table below summarizes the total potential to emit of the significant and insignificant emission units.</p>
--	---

Process/ facility	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Surface Coating	11.5	5.8	-	96.0	-	-	24.0
Woodworking	29.52	14.76	-	-	-	-	-
Insignificant Activities	1.0	0.5	-	2.0	-	-	-
Total Emissions	42.02	21.06	-	98.0	-	-	24.0

Attached Table 1 summarizes the permit conditions and requirements.

Federal Rule Applicability

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

There are no National Emission Standards for Hazardous Air Pollutants applicable to this facility. 40 CFR 63, Subpart JJ (Wood Furniture and Cabinet Coating) recordkeeping requirements are satisfied by 326 IAC 2-8-5.

State Rule Applicability

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the following conditions shall apply to the surface coating operation :

- (a) The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 8.0 tons per month. The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to 0.75 tons per month. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to 2.0 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1-2 (Visible Emission Limitations)

Pursuant to this rule, the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3 (Process Operations)

Pursuant to this rule, the following conditions shall apply:

- (a) The baghouse shall be in operation at all times when the woodworking process is in

operation, and shall not exceed the allowable particulate matter (PM) emission rate of 6.74 pounds per hour.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to this rule, if fugitive dust is visible crossing the boundary or property line of the source, the source is in violation of this fugitive dust rule. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM.

326 IAC 6

Pursuant to 326 IAC 6, the particulate matter (PM) over spray from the surface coating facilities shall be prevented from being visibly detectable at the exhaust or accumulating on the rooftops or on the ground.

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

Pursuant to this rule, the surface coatings applied to wood furniture and/or wood components shall utilize one or more 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 means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. High volume low pressure spray is an acceptable alternative application of air-assisted airless spray.

Compliance Monitoring

The entire plant has applicable compliance monitoring conditions as specified below:

The volatile organic compound (VOC) air pollutant emissions shall be limited as follows:

- (a) The total quantity of VOCs used at the plant shall be limited to 8.0 tons per month.

The hazardous air pollutant emissions shall be limited as follows:

- (a) The total quantity of HAPs used at the plant shall be limited to 2.0 tons per month.
- (b) The total quantity of any single HAP used at the plant shall be limited to 0.75 tons per month.

These operating limitations are necessary to ensure compliance with 326 IAC 2-8 (FESOP).

The baghouse controlling the woodworking operation has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions observations at the stack shall be performed in accordance with 40 CFR 60, Appendix A, Method 22. The observations will be taken in sets of three (3) six-minute readings.

This condition is necessary because the baghouse must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 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) FESOP Application GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

Conclusion

The operation of this wood furniture and cabinet manufacturing plant will be subject to the conditions of the attached proposed FESOP No.F123-6530-00007.

Table (1)

Stack/Vent ID:				
Stack/Vent Dimensions: Ht: Dia: Temp: Flow:				
Emission Unit:				
Date of Construction:				
Alternative Scenario:				
Pollution Control Equipment:				
General Description of Requirement:	VOCs Usage	HAPs Usage	Single HAP Usage	
Numerical Emission Limit:	8.0 ton VOC/mo	2.0 tons HAPs/mo	0.75 tons Single HAP/mo	
Regulation/Citation:	326IAC 2-8-3	326IAC 2-8-3	326IAC 2-8-3	
Compliance Demonstration:				
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:				
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	Total Usage	Total Usage	Total Usage	
Monitoring Method:	Monthly Log	Monthly Log	Monthly Log	
Monitoring Regulation/Citation:				
Monitoring Frequency:	Monthly	Monthly	Monthly	
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOCs Used	HAPs Used	Single HAP Used	
Recording Frequency:	Monthly	Monthly	Monthly	
Submittal Schedule of Reports:	When requested by OAM	When requested by OAM	When requested by OAM	
REPORTING REQUIREMENTS				
Information in Report:	Certification, Excess Usage	Certification, Excess Usage	Certification, Excess Usage	
Reporting Frequency/Submittal:	Semiannual	Semiannual	Semiannual	
Additional Comments:				

Table (2)

Stack/Vent ID:		E22		
Emission Unit:		Woodworking Processes		
Date of Construction:				
Alternative Scenario:				
Pollution Control Equipment:		Baghouse		
General Description of Requirement:	Baghouse shall operate at all times that woodworking is in operation. PM shall comply with 6-3 and opacity shall comply with 5-1.			
Numerical Emission Limit:	6.74 pounds of PM per hour			
Regulation/Citation:	326 IAC 6-3-2 and 326 IAC 5-1-2			
Compliance Demonstration:	Monitor visible emissions from baghouse			
PERFORMANCE TESTING		N/A		
COMPLIANCE MONITORING				
Monitoring Description:	Monitor visible emissions from baghouse			
Monitoring Method:	40 CFR 60, App A, Method 22			
Monitoring Regulation/Citation:	326 IAC 2-8			
Monitoring Frequency:	Daily			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	Visible emissions			
Recording Frequency:	Daily			
Submittal Schedule of Reports:	None - keep records on site for review by inspector			
REPORTING REQUIREMENTS		N/A		
Information in Report:				
Reporting Frequency/Submittal:				
Additional Comments:				

Indiana Department of Environmental Management Office of Air Management

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Swiss Plywood Corp.
102 Main Street, Tell City, Indiana 47586

F123-6530-00007

On March 13, 1997, the Office of Air Management (OAM) had a notice published in the Perry County Weekly, Tell City, Indiana, stating that Swiss Plywood Corp. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a wood furniture and cabinet manufacturing plant with control. 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.

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

1. The following conditions have been added to the FESOP:

- C.8 Maintenance of Monitoring Equipment [326 IAC 1-6]
The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In event that a break down of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Preventive maintenance plans for the monitors shall be implemented. In addition, prompt correction, as indicated, shall be initiated within the frames specified, whenever the parameters monitored fall outside of the indicated values.
- C.9 Pressure Gauge Specifications
Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- D.2.3 Preventive Maintenance [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.
- D.2.7 Dust Collector Operational Parameters
The Permittee shall take readings of the total static pressure drop across the baghouses controlling the woodworking operations at least once per day when the above stated facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of one (1) to seven (7) inches. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading. The instrument used for determining the pressure shall comply with subsection C.9 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least

once every six (6) months.

2. The address of the USEPA has been added to condition B.12.
3. In condition D.1.5, the word "filters" has been replaced with the word "baffles".

On April 7, 1997, Swiss Plywood Corp. submitted comments on the proposed FESOP. The summary of the comments is as follows:

Comment:

The company states that their paint spray booths were constructed before 1974, and have not been changed or modified. Thus, 326 IAC 8-2-12 does not apply.

Response:

The OAM agrees and therefore all references to types of spray guns should be changed to simply "spray guns".

Comment:

The company states that there are two (2) baghouses (E22a and E22b) controlling emissions from the woodworking operations, not the one (1) baghouse referenced in the permit.

Response:

The OAM agrees and therefore all references to the emission control devices on the woodworking operations are revised to indicate the presence of two (2) baghouses (E22a and E22b).

Comment:

The company questions when the annual certification and fee payment dates of April 15 and April 1 respectively begin, 1997 or 1998.

Response:

The company paid their FESOP fee on August 29, 1996. Therefore, the next fee payment will not be due until 1998. Since the permit will not be issued until after the annual certification date, the annual certification will not be due until 1998. No permit change is required.

Comment:

The company questions the limit of 8 tons per month (96 tons per year) for VOC emissions, instead of 8.25 tons per month (99 tons per year).

Response:

The limit of VOC emissions for a FESOP is 99 tons per year of VOC. With estimated VOC emissions from insignificant activities of 2 tons per year, only 97 tons per year is available. An emission limit of 8 tons per month results in an annual emission rate of 96 tons. Therefore, the monthly limit of 8 tons of VOC's will be retained.

Comment:

The company requests that the portion of PM assumed to be PM10 be changed from 50% to 7%.

Response:

The OAM agrees and therefore all references to the portion of PM assumed to be PM10 should be changed from 50% to 7%.

Comment:

The company questions the derivation of the allowable PM emission limit of 6.74 pounds of sawdust per hour. Also, the company is unsure if this limit is before or after controls.

Response:

The emission limit was calculated using the formula contained in 326 IAC 6-3-2, based on a process weight rate of 4200 pounds of wood production as contained on page (GSD-03 Pg 4 of 4) of the permit application. This limit is after the application of controls. No permit change is required.

