

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Woodmaster, Inc.
5170 South Third Street, St. Marks
St. Anthony, Indiana 47575

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

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

Operation Permit No.: T037-7250-00071	
Issued by: Felicia R. George, 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 cabinet manufacturing operation.

Responsible Official: **Thomas Hoffman**
Source Address: **5170 South Third Street, St. Marks, St. Anthony, IN 47575**
Mailing Address: **5170 South Third Street, St. Marks, St. Anthony, IN 47575**
SIC Code: **2511**
County Location: **Dubois**
County Status: **Attainment for all criteria pollutants**
Source Status: **Minor Source, under PSD Rules
Part 70 Permit Program**

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) The following wood cabinet surface coating operations, with a maximum capacity of 110 units per hour:
- (1) one (1) spray booth, identified as SB1, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 1.
 - (2) one (1) spray booth, identified as SB2, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 2.
 - (3) one (1) spray booth, identified as SB3, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 3.
 - (4) one (1) spray booth, identified as SB4, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 4.
 - (5) one (1) spray booth, identified as SB5, utilizing an airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 5.
 - (6) one (1) spray booth, identified as SB6, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 6.

- (7) one (1) spray booth, identified as SB7, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 7.
- (8) one (1) spray booth, identified as SB8, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 8.
- (b) Woodworking operations, with a maximum capacity of 1490 pounds per hour, which have emissions controlled by two (2) separate baghouse systems, identified as DC1 and DC2, and exhausted to Stack ID's Northfab1 and Torit1, respectively.

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) 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, and 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 for
 - (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 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);

- (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 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Office of Air Management, Compliance Section)

Facsimile No.: 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 material 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 practical. [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, IN 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)]

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

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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 requirements that become effective during the term of this permit.

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3]

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

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 3, 1997.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 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 corrective actions 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.16 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 purpose 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. This 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.17 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.18 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.19 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 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.20 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 wood cabinet surface coating operations, with a maximum capacity of 110 units per hour:

- (1) one (1) spray booth, identified as SB1, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 1.
- (2) one (1) spray booth, identified as SB2, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 2.
- (3) one (1) spray booth, identified as SB3, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 3.
- (4) one (1) spray booth, identified as SB4, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 4.
- (5) one (1) spray booth, identified as SB5, utilizing an airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 5.
- (6) one (1) spray booth, identified as SB6, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 6.
- (7) one (1) spray booth, identified as SB7, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 7.
- (8) one (1) spray booth, identified as SB8, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 8.

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

These facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to make this source a minor source pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21. If this limit has been relied upon to issue subsequent permits, the limit cannot be relaxed without being reviewed pursuant to 326 IAC 2-2 and 40 CFR 52.21.

D.1.2 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 and cabinets in the booths SB1 through SB3 and SB6 through SB8 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.

This condition shall satisfy the requirements of 326 IAC 8-1-6 for these facilities.

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

Pursuant to 326 IAC 6-3-2(c), the PM from the eight (8) paint booths (SB1 through SB8) 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:

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

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 pollutant (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 the rule is enclosed.

D.1.5 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.

D.1.6 Work Practice Standards [40 CFR 63.803]

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

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

Compliance Determination Requirements

D.1.7 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 3-2.1.
- (b) The Permittee is not required to test this facility for PM emissions 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 Particulate Matter (PM)

Pursuant to 326 IAC 2-1-3(i)(8), the dry filters for PM overspray control shall be in operation at all times when the eight (8) paint booths (SB1 through SB8) are in operation.

D.1.9 VOC Emissions

Compliance with Condition D.1.1 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.1.10 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.11 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 surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, 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 limit established in Condition D.1.1.
 - (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 (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

- (c) To document compliance with Condition D.1.6, 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.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its 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. This 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 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, with a maximum capacity of 1490 pounds per hour, which have emissions controlled by two (2) separate baghouse systems, identified as DC1 and DC2, and exhausted to Stack ID's Northfab1 and Torit1, respectively.

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 3.37 pounds per hour when operating at a process weight rate of 1490 pounds per hour. For compliance determination purposes the limit will be split between both baghouse exhausts such that DC1 and DC2 shall each have a limit of 1.68 pounds per hour.

The pounds per hour limitation was 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:

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

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

D.2.2 Particulate Matter (PM) [326 IAC 2-7-5(1)]

Pursuant to 326 IAC 2-7-5(1), the area surrounding the dust bins shall be maintained free of sawdust.

D.2.3 Opacity

Pursuant to CP-037-3403, issued on April 22, 1994, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

D.2.4 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.2.5 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.

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

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking stack exhausts (DC1 and DC2) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 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.2.8 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.

D.2.9 Dust Bin Inspections

An inspection of the sawdust outloading operation and dust bins shall be performed at least once every two weeks. The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for the sawdust outloading operation when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the dust bins.

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the DC1 and DC2 stack exhausts.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9.
- (d) 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:

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.

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the insignificant woodworking equipment 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

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.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Woodmaster, Inc.
Source Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
Mailing Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
Part 70 Permit No.: T037-7250-00071

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: Woodmaster, Inc.
Source Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
Mailing Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
Part 70 Permit No.: T037-7250-00071

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Woodmaster, Inc.
 Source Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
 Mailing Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
 Part 70 Permit No.: T037-7250-00071

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Woodmaster, Inc.
Source Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
Mailing Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
Part 70 Permit No.: T037-7250-00071
Facility: Surface Coating Booths
Parameter: VOC
Limit: Less than 250 tons per 12 consecutive month period

Quarter: _____ Year: _____

Month	VOC Usage this Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage for 12 Month Period (tons)
1			
2			
3			
No. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
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: Woodmaster, Inc.
 Source Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
 Mailing Address: 5170 South Third Street, St. Marks, St. Anthony, Indiana 47575
 Part 70 Permit No.: T037-7250-00071
 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

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

Source Background and Description

Source Name: Woodmaster, Inc.
Source Location: 5170 S. Third Street, St. Anthony, Indiana 47575
County: Dubois
SIC Code: 2511
Operation Permit No.: T037-7250-00071
Permit Reviewer: Bryan Sheets

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

Permitted Emission Units and Pollution Control Equipment

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

- (a) Booth Group A, coating wood cabinets with a maximum capacity of 55 units per hour, consisting of the following:
 - (1) one (1) spray booth, identified as SB4, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 4.
 - (2) one (1) spray booth, identified as SB5, utilizing an airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 5.

- (b) Booth Group B, coating wood cabinets with a maximum capacity of 55 units per hour, consisting of the following:
 - (1) one (1) spray booth, identified as SB1, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 1.
 - (2) one (1) spray booth, identified as SB2, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 2.
 - (3) one (1) spray booth, identified as SB3, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 3.
 - (4) one (1) spray booth, identified as SB7, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 7.
 - (5) one (1) spray booth, identified as SB8, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 8.

- (c) Booth Group C, coating wood cabinets with a maximum capacity of 55 units per hour, consisting of the following:
 - (1) one (1) spray booth, identified as SB6, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 6.
- (d) Woodworking operations, with a maximum capacity of 1490 pounds per hour, which have emissions controlled by two (2) separate baghouse systems, identified as DC1 and DC2, and exhausted to Stack ID's Northfab1 and Torit1, respectively.

Unpermitted Emission Units and Pollution Control Equipment

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

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

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (Two (2) drying ovens, capacities of 1 MMBtu/hr and 1.6 MMBtu/hr).
- (2) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (3) Paved and unpaved roads and parking lots with public access.
- (4) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (5) 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.
- (6) Insta-pak foam packaging process, used to package non-acceptable glass parts to return to the vendor.

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 037-3403-00071, issued on April 22, 1994, and
- (2) CP 037-5156-00071, issued on May 13, 1996.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on November 21, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	> 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)
Methanol	> 10
Methyl ethyl ketone	> 10
Toluene	> 10
Xylenes	> 10
All other HAPs	< 10
TOTAL	> 25

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

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	0.45
PM-10	negligible
SO ₂	negligible
VOC	122.0
CO	negligible
NO _x	negligible
Methanol	5.04
Methyl ethyl ketone	10.0
Methyl isobutyl ketone	1.86
Toluene	17.2
Xylenes	3.30
All other HAPs	< 1

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
TSP	Secondary Nonattainment (Bainbridge Twp.)
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

- (a) 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. Dubois 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) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) The spray booths are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63. 800, Subpart JJ). A copy of the federal rule is attached.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source. This status includes those activities at the source that are considered insignificant activities. The source shall be allowed to add insignificant activities not already in the permit.

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 - Booth Group A

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the spray 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:

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

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

Since these booths do not fit into any category as described in 326 IAC 8-2-1 (Applicability), the requirements of 326 IAC 8-2-12 do not apply.

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

These booths were built prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

State Rule Applicability - Booth Group B

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the spray 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:

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

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

Since these booths do not fall under any category as described in 326 IAC 8-2-1 (Applicability) due to the date of construction, the requirements of 326 IAC 8-2-12 do not apply.

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

Since these booths were built after January 1, 1980, have potential VOC greater than 25 tons per year, and they are not regulated by any other provisions of 326 IAC 8, the booths shall reduce VOC emissions using the best available control technology (BACT).

These booths were permitted previously under the limits of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). This rule requires the use of a reasonably available control technology (RACT) for new equipment, which is the type of application system used. Since the company is already complying with this limitation, it shall remain as the limit and be considered BACT for these facilities.

State Rule Applicability - Booth Group C

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the spray 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:

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

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.

State Rule Applicability - Woodworking Equipment

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the woodworking equipment (DC1 and DC2) shall not exceed 3.37 pounds per hour when operating at a process weight rate of 1490 pounds per hour.

The pounds per hour limitation was 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:

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

Both collection system and exhaust points have actual emissions lower than the limitation. Therefore, the woodworking operation can comply with 326 IAC 6-3-2.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray 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.

Conclusion

The operation of this wood cabinet manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T037-7250-00071**.

Table 1

Description of facility: Booth Group A (Spray Booths 4 and 5)
Max Rating: 55 units per hour
Construction Date: 1979
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: Booth 4 and Booth 5

Facility class: Description: Surface coating of wood furniture

EMISSION LIMITATIONS		PM	HAPs
Numerical Emission Limit:	Use of dry filters is required for the paint booths	(1) Finishing operations - 1.0 lb VHAP/lb solids (2) Thinners used for on-site formulation of washcoats, basecoats, and enamels - 3% VHAP content by weight (3) All other solvents and thinner mixtures - 10% VHAP content by weight (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb solids (5) All other contact adhesives - 1.0 lb VHAP/lb solids (6) Strippable spray booth material - 0.8 lb VOC/lb solids	
Regulation/Citation:	326 IAC 6-3-2(c)	40 CFR 63.800 (NESHAP - Subpart JJ)	
Compliance Demonstration:	Record Keeping	Record Keeping and Reporting	
PERFORMANCE TESTING		NA	NA
COMPLIANCE MONITORING			
Monitoring Description:	Record Keeping	NA	
Monitoring Method:	Visible Emissions	NA	
Monitoring Regulation/Citation:	326 IAC 6-3-2(c)	NA	
Monitoring Frequency:	Daily and Weekly	NA	
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Visible Emissions	A Certified Product Data Sheet for each finishing material, thinner, contact adhesive, and strippable booth coating.	
Recording Frequency:	Daily and Weekly	Monthly	
REPORTING REQUIREMENTS			
Information in Report:	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.	
Reporting Frequency/Submittal:	NA	The Initial Compliance Report must be submitted within 60 days following the compliance date of December 7, 1998. The Continuous Compliance Demonstration Report must be submitted every six months.	
Additional Comments:	NA	NA	

Table 2

Description of facility: Booth Group B (Spray Booths 1, 2, 3, 7 and 8)
Max Rating: 55 units per hour
Construction Date: 1985
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: Booth 1, Booth 2, Booth 3, Booth 7, and Booth 8

Facility class: Description: Surface coating of wood furniture

EMISSION LIMITATIONS	PM	VOC	HAPs
Numerical Emission Limit:	Use of dry filters is required for the paint booths	Use specified application methods	(1) Finishing operations - 1.0 lb VHAP/lb solids (2) Thinners used for on-site formulation of washcoats, basecoats, and enamels - 3% VHAP content by weight (3) All other solvents and thinner mixtures - 10% VHAP content by weight (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb solids (5) All other contact adhesives - 1.0 lb VHAP/lb solids (6) Strippable spray booth material - 0.8 lb VOC/lb solids
Regulation/Citation:	326 IAC 6-3-2(c)	326 IAC 8-1-6	40 CFR 63.800 (NESHAP - Subpart JJ)
Compliance Demonstration:	Record Keeping	NA	Record Keeping and Reporting
PERFORMANCE TESTING	NA	NA	NA
COMPLIANCE MONITORING			
Monitoring Description:	Record Keeping	NA	NA
Monitoring Method:	Visible Emissions	NA	NA
Monitoring Regulation/Citation:	326 IAC 6-3-2(c)	NA	NA
Monitoring Frequency:	Daily and Weekly	NA	NA
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Visible Emissions	NA	A Certified Product Data Sheet for each finishing material, thinner, contact adhesive, and strippable booth coating.
Recording Frequency:	Daily and Weekly	NA	Monthly
REPORTING REQUIREMENTS			
Information in Report:	NA	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.
Reporting Frequency/Submittal:	NA	NA	The Initial Compliance Report must be submitted within 60 days following the compliance date of December 7, 1998. The Continuous Compliance Demonstration Report must be submitted every six months.
Additional Comments:	NA	NA	NA

Table 3

Description of facility: Booth Group C (Spray Booth 6)
Max Rating: 55 units per hour
Construction Date: 1985 (reconstructed in 1996)
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: Booth 6

Facility class: Description: Surface coating of wood furniture

EMISSION LIMITATIONS		PM	VOC	HAPs
Numerical Emission Limit:	Use of dry filters is required for the paint booths	Use specified application methods	(1) Finishing operations - 1.0 lb VHAP/lb solids (2) Thinners used for on-site formulation of washcoats, basecoats, and enamels - 3% VHAP content by weight (3) All other solvents and thinner mixtures - 10% VHAP content by weight (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb solids (5) All other contact adhesives - 1.0 lb VHAP/lb solids (6) Strippable spray booth material - 0.8 lb VOC/lb solids	
Regulation/Citation:	326 IAC 6-3-2(c)	326 IAC 8-2-12	40 CFR 63.800 (NESHAP - Subpart JJ)	
Compliance Demonstration:	Record Keeping	NA	Record Keeping and Reporting	
PERFORMANCE TESTING		NA	NA	NA
COMPLIANCE MONITORING				
Monitoring Description:	Record Keeping	NA	NA	
Monitoring Method:	Visible Emissions	NA	NA	
Monitoring Regulation/Citation:	326 IAC 6-3-2(c)	NA	NA	
Monitoring Frequency:	Daily and Weekly	NA	NA	
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	Visible Emissions	NA	A Certified Product Data Sheet for each finishing material, thinner, contact adhesive, and strippable booth coating.	
Recording Frequency:	Daily and Weekly	NA	Monthly	
REPORTING REQUIREMENTS				
Information in Report:	NA	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.	
Reporting Frequency/Submittal:	NA	NA	The Initial Compliance Report must be submitted within 60 days following the compliance date of December 7, 1998. The Continuous Compliance Demonstration Report must be submitted every six months.	
Additional Comments:	NA	NA	NA	

Table 4

Description of facility: Woodworking Equipment
Max Rating: 1490 pounds per hour
Construction Date: 1985
Control Device (if any): Baghouse
Stack/Vent ID: Northfab1 and Torit1

Facility class: Description: Surface coating of wood furniture

EMISSION LIMITATIONS		PM
Numerical Emission Limit:	3.37 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2(c)	
Compliance Demonstration:	Record Keeping	
PERFORMANCE TESTING		NA
COMPLIANCE MONITORING		
Monitoring Description:	Record Keeping	Record Keeping
Monitoring Method:	Visible Emissions	Baghouse Inspections
Monitoring Regulation/Citation:	326 IAC 6-3-2(c)	326 IAC 2-7-5
Monitoring Frequency:	Daily and Weekly	Quarterly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible Emissions	Baghouse Integrity
Recording Frequency:	Daily and Weekly	Quarterly
REPORTING REQUIREMENTS		
Information in Report:	NA	
Reporting Frequency/Submittal:	NA	
Additional Comments:	NA	

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

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name: Woodmaster, Inc.
Source Location: 5170 S. Third St., St. Marks, St. Anthony, IN 47575
County: Dubois
SIC Code: 2512
Operation Permit No.: T037-7250-00071
Permit Reviewer: Bryan Sheets

On November 3, 1997, the Office of Air Management (OAM) had a notice published in The Herald, Jasper, Indiana, stating that Woodmaster, Inc. had applied for a Part 70 Operating Permit to operate their 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 December 3, 1997, Woodmaster, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

A billing for permit fees associated with the applicability of 326 IAC 20-14 (40 CFR 63, Subpart JJ) was included with the Public Notice package. We do not believe that we owe this fee under the State's current rules.

Response to Comment 1:

The OAM agrees that fees should not have been assessed for the NESHAP. Fees are only charged for Title V review if there is new source review. Therefore, the fee will not be required for issuance of the Title V permit.

Comment 2:

This is a summary of Comment Nos. 2 and 8 from Woodmaster's letter dated December 3, 1997. We would like to modify the description of the surface coating equipment to remove the Group A, B, and C designations because they do not accurately depict the operation. In addition, the maximum capacity of the booths should be stated as 110 units per hour instead of 55 units per hour. Fifty-five units per hour represents a maximum capacity for larger products, but smaller units can have a maximum production rate as high as 110 units per hour.

Response to Comment 2:

The OAM agrees that the Group designations can be removed from the permit. These designations were necessary for rule analysis, but do not provide any additional use in describing the equipment.

The capacity of the booths was stated as 55 units per hour in the Part 70 application. However, the OAM understands that for smaller units the capacity can increase with little or no increase in emissions because less paint would be used for the smaller units. The description can be changed only because the source has requested that a collective limit on potential to emit (PTE) be placed on all the booths as discussed in Comment 4. This will ensure that the VOC emissions from these surface coating booths will always be less than PSD thresholds regardless of the number of units being painted per hour.

Comment 3:

This is a summary of Comment Nos. 3 and 15 from Woodmaster's letter dated December 3, 1997. Our application identified the fact that we have some insignificant grinding and machining operations. It is unclear why IDEM has included these as "Specifically Regulated" insignificant activities in Section A.3 of the permit. We request that this designation and Section D.3, which contains specific conditions for this equipment, be removed from the permit.

Response to Comment 3:

Although the Title V permit application allows sources to describe certain facilities as "insignificant activities" due to inherently low emissions, it does not remove the requirement for every facility at the source to comply with all State and Federal rules. IDEM, OAM has identified these types of facilities as "Specifically Regulated Insignificant Activities". Furthermore, one purpose of the Title V program is to include all State and Federal rules applicable to the source in the permit. The grinding and machining operations identified in the permit application are considered process operations subject to 326 IAC 6-3-2 (Process Operations). That is why Section A.3 and D.3 have been included in the permit.

Comment 4:

This is a summary of Comment Nos. 4, 9, and 16 from Woodmaster's letter dated December 3, 1997. We would like to request that the surface coating booths be grouped together under one limit of 249 tons per 365 day period. This will allow our source to be considered minor for the purposes of 326 IAC 2-2 (Prevention of Significant Deterioration).

Response to Comment 4:

Since grouping the booths under one limit of 249 tons per year is more stringent than the current situation, the OAM will change the limits and redesignate the source as minor for purposes of PSD. Additional record keeping and reporting will also be added. Record keeping and reporting requirements will be required for this limit. See changes 41, 49, and 50 following these comments.

Comment 5:

Condition C.15 requires the submittal and maintenance of an Emergency Reduction Plan (ERP). We submitted an ERP with these comments which we believe is adequate to fulfill the requirement. We would request that this condition be modified to reflect that a plan has been submitted.

Response to Comment 5:

The OAM agrees and will modify the condition to reflect that an ERP has been submitted. See change 33 following these comments.

Comment 6:

We do not have any regulated substances present in quantities greater than the threshold quantities listed in 40 CFR 68, and therefore would request that Condition C.16 be eliminated from the Part 70 permit.

Response to Comment 6:

The OAM agrees that this condition does not apply to the operations at Woodmaster's facility and will be removed from the permit.

Comment 7:

We do not believe that 40 CFR Part 70, 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. We would request that all references to a CRP be eliminated from Condition C.17.

Response to Comment 7:

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

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

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit.

This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

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

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

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

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

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

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

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

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

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

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

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

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

Comment 8:

Condition D.1.9 (HAP Content) is under Compliance Determination Requirements. Since this condition requires reports we would request that this condition should be included in the Record Keeping and Reporting Requirements section.

Response to Comment 8:

This condition is a reporting requirement that is already specified in Condition D.1.13. Therefore, this is a redundant condition and will be removed from the permit.

Comment 9:

Conditions D.1.10, D.1.11, D.2.5, D.2.6, D.2.7, D.2.8, and D.2.9 require that we perform daily or weekly inspections of our dry filters, baghouses, roofs, and dust bins. As indicated in our Compliance Monitoring Plan, which we submitted with our application, all of the emission units covered by the permit have allowable emissions less than 10 lbs/hr of particulate matter. It is our understanding that compliance monitoring plans were not required for smaller emission units (below 10 lbs/hr allowable emissions), and that compliance monitoring sections would not be included in the Title V permits. We request that these conditions and the associated record keeping be eliminated from the permit.

Response to Comment 9:

The Title V Compliance Monitoring Guidance, dated May 14, 1996, states that Compliance Monitoring Plans are not required to be submitted with the application for facilities with allowable emissions less than 10 lbs/hr. It does not state that compliance monitoring conditions would not be included in the permit. Conversely, the guidance gave examples of what the minimum amount of compliance monitoring would be required for small woodworking sources and surface coating. In addition, the Office of Air Management has continued to discuss compliance monitoring with woodworking sources since the development of this guidance and has concluded that the compliance monitoring required in Woodmaster's permit is a reasonable requirement to assure continuous compliance with all applicable rules. This is consistent with every woodworking and surface coating source in the State. Therefore, the compliance monitoring conditions and the associated record keeping requirements will not be removed from the permit.

Comment 10:

While we believe that Condition D.1.10(b) establishes a vague standard in that it requires corrective actions for "evidence of overspray". This could conceivably require corrective actions due to relatively minor amounts of solids on the roof or other nearby surfaces, which would in no way represent a violation of the underlying applicable requirement. For this reason we would request that the second sentence of paragraph (b) be eliminated.

Response to Comment 10:

The demonstration of continuous compliance with particulate matter limitations are required by the Title V permit. OAM has determined that the presence of overspray or evidence of overspray emissions on the roof may indicate that the process is not in continuous compliance. The CRP can include criteria to clarify when visible evidence of overspray emissions would indicate an abnormal situation for a specific case and necessitate corrective action. However, the OAM has changed the language to be more specific. See change 48 following these comments.

Comment 11:

In Condition D.2.7(a), we have specific concerns with the requirement to shutdown the failed compartments until they have been replaced or repaired. The dust collector has only a single compartment, and therefore this condition would necessitate the shutdown of the entire unit and the associated production equipment.

We also believe that paragraph (b) of this condition is adequate to provide for the evaluation of the problem and the development of a corrective action plan, without requiring the shutdown of the unit. In addition, the condition does not cite the specific regulatory authority to require the shutdown of the malfunctioning compartment, and we are unaware that such specific authority exists in the State rules. Lastly, this condition is potentially in conflict with Condition B.13 which establishes specific procedures for “emergency” situations. Therefore, we request that paragraph (a) be removed from the permit.

Response to Comment 11:

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

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

Therefore, the OAM believes that the requirement to shutdown the affected compartment, in this case the baghouse and associated production equipment, is a reasonable action to ensure compliance with the particulate matter limitations. Additionally, Woodmaster always has the option of purchasing and installing a baghouse with more than one compartment to avoid these situations. The language in Condition D.2.7(a) has been changed to clarify the OAM’s position. See change 56 following these comments.

Comment 12:

Condition D.1.11(b)(5) requires that we maintain records of monthly average HAP contents of our surface coating data. This information is only relevant if we use monthly averages to demonstrate compliance. If we choose to demonstrate compliance by using all compliant coatings, we are not obligated under Subpart JJ to calculate monthly averages. We would suggest that this condition be amended by adding the phrase “if compliance is demonstrated based on monthly averages.” to the end of the condition. Also, this condition requires that we maintain records for 36 months which conflicts with the requirement in Condition C.21 which requires that records be maintained for five years. Please clarify.

Response to Comment 12:

The OAM agrees that monthly averaging calculations are only required if monthly averaging is used to demonstrate compliance with Subpart JJ. Therefore, Condition D.1.11(b)(5) will be modified to reflect this. All records are required to be kept for a minimum of five years. Condition D.1.11(a) will be corrected. See change 49 following these comments.

Comment 13:

Dubois County is secondary nonattainment for Bainbridge Township. Woodmaster is located in Jackson Township. The attainment status for PM and PM10 for Woodmaster, Inc. should be revised to reflect the current attainment status for Dubois County - Jackson Township.

Response to Comment 13:

It is noted that Woodmaster is located in Jackson Township which is currently attainment for TSP and PM10.

The OAM has determined that the following changes shall be made to the permit (old wording has been struck out and new wording has been bolded for emphasis):

1. The first paragraph of Section A has been changed to be as follows on page 5 of 40 of the final permit:

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. Condition A.1 (General Information) has been changed to be as follows on page 5 of 40 of the final permit:

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

The Permittee owns and operates a **stationary** wood cabinet manufacturing operation.

Responsible Official: **Thomas Hoffman**
Source Address: **5170 South Third Street, St. Marks, St. Anthony, IN 47575**
Mailing Address: **5170 South Third Street, St. Marks, St. Anthony, IN 47575**
SIC Code: **2511**
County Location: **Dubois**
County Status: Attainment for all criteria pollutants
Source Status: ~~Major~~ **Minor** Source, under PSD or Emission Offset Rules
~~Major Source~~, Part 70 Permit Program

3. Condition A.2 (Emission Units and Pollution Control Equipment Summary) has been changed to be as follows on pages 5 and 6 of 40 of the final permit:

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) The following wood cabinet surface coating operations **with a maximum capacity of 110 units per hour**:

~~Booth Group A, coating wood cabinets with a maximum capacity of 55 units per hour, consisting of the following:~~

- (1) one (1) spray booth, identified as SB4, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 4.

- (2) one (1) spray booth, identified as SB5, utilizing an airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 5.

~~Booth Group B, coating wood cabinets with a maximum capacity of 55 units per hour, consisting of the following:~~

- ~~(+)~~ (3) one (1) spray booth, identified as SB1, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 1.
- ~~(2)~~ (4) one (1) spray booth, identified as SB2, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 2.
- ~~(3)~~ (5) one (1) spray booth, identified as SB3, utilizing an air assisted airless HVLP application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 3.
- ~~(4)~~ (6) one (1) spray booth, identified as SB7, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 7.
- ~~(5)~~ (7) one (1) spray booth, identified as SB8, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 8.

~~Booth Group C, coating wood cabinets with a maximum capacity of 55 units per hour, consisting of the following:~~

- ~~(+)~~ (8) one (1) spray booth, identified as SB6, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID Booth 6.

- (b) Woodworking operations, with a maximum capacity of 1490 pounds per hour, which have emissions controlled by two (2) separate baghouse systems, identified as DC1 and DC2, and exhausted to Stack ID's Northfab1 and Torit1, respectively.

- 4. Condition A.4 (Part 70 Permit Applicability) has been changed to be as follows on page 6 of 40 of the final permit:

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 subject to a standard or other requirement under Section 112 of the Clean Air Act.~~ **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).**

5. Condition A.5 (Prior Permit Conditions Superseded) has been removed from the permit.
6. Subsection (b) of Condition B.1 (Permit No Defense) has been changed to be as follows on page 7 of 40 of the final permit:
 - (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."**
7. Subsection (c) of Condition B.8 (Duty to Supplement and Provide Information) has been changed to be as follows on page 8 of 40 of the final permit:
 - (c) Upon 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~~ **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee shall 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 shall must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

~~Such confidentiality claim 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).~~
8. Condition B.11 (Annual Compliance Certification) has been changed to be as follows on pages 8 and 9 of 40 of the final permit:

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).

9. Condition B.12 (Preventive Maintenance Plan) has been changed to be as follows on pages 8 and 9 of 40 of the final permit:

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.

10. Condition B.14 (Permit Shield) has been changed to be as follows on pages 11 and 12 of 40 of the final permit:

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 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.**
 - (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.**
 - ~~(b)~~ **(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.**
 - ~~(c)~~ ~~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.~~

- ~~(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)]

11. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed to be as follows on pages 12 and 13 of 40 of the final 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.

- ~~(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.**

12. Subsection (a) of Condition B.18 (Permit Renewal) has been changed to be as follows on page 14 of 40 of the final permit:

- (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).**

13. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have been replaced with a single condition (Permit Amendment or Modification) as follows on pages 14 and 15 of 40 of the final 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)]**

14. Condition B.24 (Inspection and Entry) has been changed to be as follows on page 17 of 40 of the final permit:

~~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]**

15. Subsection (b) of Condition B.25 (Transfer of Ownership or Operation) has been changed to be as follows on page 17 of 40 of the final permit:

- (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).**

16. Condition B.26 (Annual Fee Payment) has been changed to be as follows on page 18 of 40 of the final permit:

~~B.26~~ **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 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-~~5674~~ **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.~~

17. Condition B.27 (Credible Evidence) has been added as follows on page 18 of 40 of the final permit:

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

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

18. Condition C.1 (Major Source) has been deleted from the final permit. The condition defined whether the source was major or minor for PSD and limited the total source emissions below the PSD threshold. However, Conditions A.1 and D.1.1 also define the source and limit the emissions. Therefore, the condition was considered redundant and unnecessary.
19. Condition C.1 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour) has been added as follows on page 19 of 40 of the final permit:

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

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

20. Condition C.2 (Opacity) has been changed to be as follows on page 19 of 40 of the final permit:

C.2 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.~~

21. Condition C.3 (Open Burning) has been changed to be as follows on page 19 of 40 of the final permit:

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

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

22. Condition C.4 (Incineration) has been changed to be as follows on page 19 of 40 of the final permit:

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

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

23. Condition C.5 (Fugitive Dust Emissions) has been changed to be as follows on page 19 of 40 of the final permit:

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

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

24. Condition C.6 (Operation of Equipment) has been changed to be as follows on page 19 of 40 of the final permit:

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

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation, ~~as described in Section D of this permit.~~

25. Condition C.7 (Stack Height) has been changed to be as follows on page 19 of 40 of the final permit:

C.7 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.~~

26. Condition C.8 (Asbestos Abatement Projects - Accreditation) has been replaced as follows on page 20 of 40 of the final permit:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

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

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

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

(A) **Asbestos removal or demolition start date;**

(B) **Removal or demolition contractor; or**

(C) **Waste disposal site.**

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

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

All required notifications shall be submitted to:

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

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

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

27. Condition C.9 (Performance Testing) has been changed to be as follows on page 21 of 40 of the final permit:

C.9 Performance Testing [~~326 IAC 3-2-4~~ **3-6**]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-4~~ **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 ~~with~~ **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).

28. Condition C.10 (Compliance Schedule) has been changed to be as follows on page 21 of 40 of the final permit:

C.10 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 ~~continue to~~ comply with such requirements that become effective during the term of this permit.

29. Condition C.11 (Compliance Monitoring) has been changed to be as follows on pages 21 and 22 of 40 of the final permit:

C.11 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 schedules an additional ninety (90) days provided the Permittee notifies** ~~shall notify:~~

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, ~~no more than~~ **prior to the end of the initial** ninety (90) days ~~after receipt of this permit compliance schedule,~~ 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 ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

30. Condition C.12 (Maintenance of Monitoring Equipment) has been removed from the permit.
31. Condition C.12 (Monitoring Methods) has been changed to be as follows on page 22 of 40 of the final permit:

~~C.13~~ C.12 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, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

32. Condition C.14 (Asbestos Abatement Projects) has been removed from the permit.
33. Condition C.13 (Emergency Reduction Plans) has been changed to be as follows on page 22 of 40 of the final permit:

~~C.15~~ **C.13** 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.~~ **The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 3, 1997.**

~~(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.~~

~~(c)~~ **(b)** If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM shall supply such a plan.~~

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

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

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

34. Condition C.16 (Risk Management Plan) has been removed from the final permit.

35. Condition C.14 (Compliance Monitoring Plan - Failure to Take Response Steps) has had the rule cites changed as follows on page 22 of 40 of the final permit:

~~[326 IAC 2-7-5(3)]~~ **[326 IAC 2-7-6] [326 IAC 1-6]**

36. Condition C.15 (Actions Related to Noncompliance Demonstrated by a Stack Test) has been changed to be as follows on pages 23 and 24 of 40 of the final permit:

~~C.15~~ **C.15** 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).

- 37. Condition C.16 (Emission Statement) has been changed to be as follows on page 24 of 40 of the final permit:

~~C.16~~ **C.16** 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** ~~a certified, annual emission statement~~ that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. This annual emission statement shall meet the following requirements:

- (1) ~~Contain~~ **Indicate** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) ~~Contain~~ **Indicate** actual emissions of other regulated pollutants from the source, for purpose 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. This 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.

- 38. Condition C.17 (Monitoring Data Availability) has had the following rule cites added on page 24 of 40 of the final permit:

[326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

39. Subsection (a) of Condition C.18 (General Record Keeping Requirements) has been changed to be as follows on page 25 of 40 of the final permit:

~~C.21~~ **C.18** 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 ~~within one (1) hour~~ upon ~~verbal~~ the request of an IDEM, OAM, representative, ~~for a minimum of three (3) years.~~ **The records** may be stored elsewhere for the remaining two (2) years **providing as long as they are made available within thirty (30) days after written 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.**

40. Condition C.19 (General Reporting Requirements) has been changed to be as follows on pages 25 and 26 of 40 of the final permit:

~~C.22~~ **C.19** 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).

41. Condition D.1.1 (Volatile Organic Compounds) has been changed to be as follows on page 27 of 40 of the final permit:

~~D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-4] PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]~~

~~(a) Any change or modification which may increase potential emissions to 250 tons per year from the equipment covered under Booth Groups A and B shall obtain a PSD permit pursuant to 326 IAC 2-2 before such change may occur.~~

~~(b) Any change or modification which may increase potential emissions to 250 tons per year from the equipment covered under Booth Group C shall obtain a PSD permit pursuant to 326 IAC 2-2 before such change may occur.~~

These facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to make this source a minor source pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21. If this limit has been relied upon to issue subsequent permits, the limit cannot be relaxed without being reviewed pursuant to 326 IAC 2-2 and 40 CFR 52.21.

42. Subsection (b)(1)(B) of Condition D.1.4 (Wood Furniture NESHAP) has been changed to be as follows on page 28 of 40 of the final permit:

(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. ~~Solvent and thinner mixtures used for other purposes~~ **All other thinners** have a ten percent (10.0%) maximum VHAP content by weight; or

43. Condition D.1.5 (Preventive Maintenance Plan) has had the rule cites changed to be as follows on page 29 of 40 of the final permit:

~~[326 IAC 2-7-4(c)(9)]~~ **[326 IAC 2-7-5(13)]** ~~[326 IAC 1-6-3]~~

44. Condition D.1.7 (Testing Requirements) has been changed to be as follows on page 29 of 40 of the final permit:

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

~~Testing of this facility is not specifically required by this permit. However, if testing is required, 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. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

- (a) **Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.**
- (b) **The Permittee is not required to test this facility for PM emissions 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.**

45. Condition D.1.9 (HAP Content) has been removed from the permit because Condition D.1.13 contains the same requirement.

46. Condition D.1.9 (VOC Emissions) has been added to the permit as follows on page 29 of 40 of the final permit:

D.1.8 VOC Emissions

Compliance with Condition D.1.1 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.

47. Condition D.1.10 (Volatile Organic Compounds) has been added to the permit as follows on page 29 of 40 of the final permit:

D.1.10 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

48. Condition D.1.11 (Monitoring) has been changed to be as follows on page 30 of 40 of the final permit:

~~D.1.10~~ **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 surface coating booth stacks** while one or more of the booths are in operation. **The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The ~~Preventive Maintenance~~ **Compliance Response** Plan for this unit shall contain troubleshooting contingency and corrective actions for when **a noticeable change in overspray emission, 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.

49. Condition D.1.12 (Record Keeping Requirements) has been changed to be as follows on pages 30 and 31 of 40 of the final permit:

~~D.1.11~~ **D.1.12** Record Keeping Requirements

- (a) ~~To document compliance with Condition D.1.1, records of surface coating quantities and organic solvent contents for Booth Groups A, B, and C shall be maintained for a minimum period of 36 months and made available upon request of the Office of Air Management (OAM). 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.~~ **To document compliance with Condition D.1.1, 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 limit established in Condition D.1.1.**
- (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 (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) **When the averaging compliance method is used**, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition ~~D.1.10~~ **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.

50. Condition D.1.13 (Reporting Requirements) has been changed to be as follows on page 31 of 40 of the final permit:

~~D.1.12~~ **D.1.13** Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.**
- ~~(a)~~ **(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. This initial compliance report must include data from the entire month that the compliance date falls.

- ~~(b)~~ (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, using the semi-annual reporting form located at the end of this permit, or its equivalent, 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**

51. Conditions from previous permits must be kept in the Title V permit unless the condition was erroneously added at the time of the original permit review. In CP-037-3403, the woodworking equipment was given a 10% opacity limit to document compliance with 326 IAC 6-3-2. This will be added to the permit as follows on page 32 of 40 of the final permit:

D.2.3 Opacity

Pursuant to CP-037-3403, issued on April 22, 1994, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

52. Condition D.2.4 (Preventive Maintenance Plan) has had the rule cites changed to be as follows on page 32 of 40 of the final permit:

~~[326 IAC 2-7-4(c)(9)]~~ **[326 IAC 2-7-5(13)]** [326 IAC 1-6-3]

53. Condition D.2.5 (Testing Requirements) has been changed to be as follows on page 32 of 40 of the final permit:

~~D.2.4~~ **D.2.5 Testing Requirements** [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is 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.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.~~

54. Subsections (a) and (e) of Condition D.2.6 (Visible Emission Notations) has been changed to be as follows on pages 32 and 33 of 40 of the final permit:

- (a) Daily visible emission notations of the woodworking stack exhausts (DC1 and DC2) shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.
- (e) The ~~Preventive Maintenance~~ **Compliance Response** Plan for the woodworking operations shall contain troubleshooting contingency and ~~corrective actions~~ **response steps** for when an abnormal emission is observed.

55. Condition D.2.7 (Baghouse Inspections) has been changed to be as follows on page 33 of 40 of the final permit:

D.2.7 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.

56. Condition D.2.8 (Broken Bag or Failure Detection) has been changed to be as follows on page 33 of 40 of the final permit:

~~D.2.7~~ **D.2.8** 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) ~~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.~~ **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.**

57. Condition D.2.9 (Dust Bin Inspections) has been changed to be as follows on page 33 of 40 of the final permit:

D.2.9 Dust Bin Inspections

An inspection of the sawdust outloading operation and dust bins shall be performed at least once every two weeks. The ~~Preventive Maintenance~~ **Compliance Response** Plan for the woodworking operations shall contain troubleshooting contingency and ~~corrective actions~~ **response steps** for the sawdust outloading operation when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the dust bins.

58. Condition D.2.10 (Record Keeping Requirements) has been changed to be as follows on page 33 of 40 of the final permit:

~~D.2.9~~ **D.2.10** Record Keeping Requirements

- (a) To document compliance with Condition ~~D.2.5~~ **D.2.6**, the Permittee shall maintain records of daily visible emission notations of the DC1 and DC2 stack exhausts.
- (b) To document compliance with Condition ~~D.2.6~~ **D.2.7**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.2.6~~ **D.2.7, and the dates the vents are redirected.**
- (c) To document compliance with Condition ~~D.2.8~~ **D.2.9**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.2.8~~ **D.2.9.**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

59. Condition D.3.2 (Testing Requirements) has been changed to be as follows on page 34 of 40 of the final permit:

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

~~Testing of The Permittee is not required to test this facility is 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.~~

60. The Certification Form, Compliance Monitoring Report Form, Emergency/Deviation Occurrence Report Form, and Semi-annual NESHAP Report Form have been updated.
61. The Table of Contents has been updated to reflect the above mentioned changes.

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

Company Name: Woodmaster, Inc.
Address City IN Zip: 5170 South Third Street, St. Marks, St. Anthony, IN
Permit No.: T037-7250
Plt ID: 037-00071
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
Booth Group A																
Vinyl Washcoat	7.14	91.99%	0.0%	92.0%	0.0%	8.01%	0.100000	55.00	6.57	6.57	36.12	866.99	158.23	0.00	82.00	100%
Distressed Oak W/S	7.93	86.11%	0.0%	86.1%	0.0%	13.90%	0.100000	55.00	6.74	6.74	37.08	890.00	162.42	0.00	48.51	100%
Stain Reducer	6.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.100000	55.00	6.54	6.54	35.97	863.28	157.55	0.00	ERR	50%
Cherry Fruit W/S	8.09	79.70%	0.0%	79.7%	0.0%	20.30%	0.100000	55.00	6.45	6.45	35.46	851.10	155.33	19.78	31.76	50%
American Oak Glaze	7.84	85.10%	0.0%	85.1%	0.0%	14.90%	0.100000	55.00	6.67	6.67	36.70	880.68	160.72	14.07	44.78	50%
Vintage Wipe Stain	7.61	87.18%	0.0%	87.2%	0.0%	12.82%	0.100000	55.00	6.63	6.63	36.49	875.74	159.82	11.75	51.75	50%
Booth Group B																
Amber NGR Toner	6.71	99.74%	0.0%	99.7%	0.0%	0.56%	0.100000	55.00	6.69	6.69	36.81	883.42	161.22	0.00	1195.10	100%
Poplar NGR Toner	6.8	98.30%	0.0%	98.3%	0.0%	1.70%	0.100000	55.00	6.68	6.68	36.76	882.34	161.03	0.00	393.20	100%
Cherry NGR Toner	6.83	98.11%	0.0%	98.1%	0.0%	1.89%	0.100000	55.00	6.70	6.70	36.86	884.52	161.42	1.55	354.55	50%
Fruitwood NGR Toner	6.8	98.45%	0.0%	98.5%	0.0%	1.55%	0.100000	55.00	6.69	6.69	36.82	883.69	161.27	1.27	431.91	50%
Distressed Oak Toner	6.87	98.73%	0.0%	98.7%	0.0%	1.27%	0.100000	55.00	6.78	6.78	37.31	895.32	163.40	1.05	534.07	50%
Washed Poplar Toner	6.94	96.35%	0.0%	96.4%	0.0%	3.65%	0.100000	55.00	6.69	6.69	36.78	882.64	161.08	3.05	183.20	50%
Booth Group C																
Black Lacquer	7.9	83.81%	0.0%	83.8%	0.0%	16.19%	0.083000	55.00	6.62	6.62	30.22	725.40	132.38	12.79	40.90	50%
Catalyzed Sealer	7.7	71.95%	0.0%	72.0%	0.0%	28.05%	0.068000	55.00	5.54	5.54	20.72	497.28	90.75	17.69	19.75	50%
Catalyst	9.06	55.70%	0.0%	55.7%	0.0%	44.23%	0.003000	55.00	5.05	5.05	0.83	19.98	3.65	1.45	11.41	50%

Actual Usage
gallons per year

Actual VOC
tons per year

249338.22 890.1374454

State Potential Emissions Add worst case coating to all solvents

490.93 11782.38 2150.29 84.46
x(1-0.95) due to dry filters
3.76

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) * (gal/unit) * (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: Woodmaster, Inc.
City, Indiana: St. Anthony, Indiana
Reviewer: Bryan Sheets
Date: 07/24/97
OP No.: T037-7250-00071

A. Allowable Emissions

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

$$E = 4.10 * (P)^{0.67}, \quad \text{where } E = \text{allowable emission rate in lbs/hr}$$
$$P = \text{process weight rate in tons/hr} = 0.745$$

$$E = 4.10 * (0.745)^{0.67}$$

$$E = 3.37 \text{ lbs/hr}$$

Since the woodworking operations have emissions collected by two separate baghouses the limit of 3.37 lbs/hr will be split between both baghouses. This will give a limit of 1.68 lbs/hr to each baghouse.

To demonstrate compliance with this limit, actual emissions from the baghouses will be determined as follows:

Actual amount collected per hour for baghouse DC1 = 165 lbs
Collection efficiency of the baghouse DC1 = 99.99%

$$\text{Amount entering baghouse} * 0.9999 = 165 \text{ lbs/hr}$$

$$\text{Amount entering baghouse} = 165.02$$

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

$$\text{Actual emissions} = 165.02 \text{ lbs/hr} - 165 \text{ lbs/hr}$$

$$\text{Actual emissions} = 0.02 \text{ lbs/hr}$$

The actual emissions are well below the limit. Therefore, this baghouse can comply with 326 IAC 6-3-2. The other baghouse has approximately the same characteristics. Therefore, it can comply with 326 IAC 6-3-2 as well.