

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Springs Valley Manufacturing
A Division of Kimball International, Inc.
8831 West State Road 56
West Baden Springs, Indiana 47469**

(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 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.: T117-7357-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood furniture products manufacturing operation.

Responsible Official: Dale Lassiter, Operations Manager
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469
Telephone Number: 812-634-3702 (contact: Gayle Pahmeier)
SIC Code: 2511, 2521, 2434, 2517
County Location: Orange
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules
Major Source, Section 112 of the Clean Air Act

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

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

Wood coating spray booths and dip tanks, including:

- (a) Thirty-six (36) spray coating booths, identified as 1 through 32 and 34 through 37, using dry filters (booths 1 through 32 and 34 through 36) and baffles (booth 37) for particulate matter control;
- (b) One (1) coating dip tank, identified as station 33;
- (c) One (1) Automated Flat Line Finishing System, identified as SB-38;

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) Woodworking operations, including a scrap wood grinding process, with six (6) baghouses for particulate matter control, exhausting to stacks MBH-1, MBH-2, MBH-3, TBH-1, TBH-2, and PBHV-1. Sawdust from the baghouse silos is conveyed into closed semi-trailers. Wood chips from the grinder are transferred pneumatically and collected by cyclone. [326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 6-3]
- (b) Other activities or categories not previously identified with potential, uncontrolled emissions equal to or less than thresholds require listing only. Pb 0.6 ton per year or 3.29 pounds per day, SO₂ 5 pounds per hour or 25 pounds per day. NO_x 5 pounds per hour or 25 pounds per day, CO 25 pounds per day, PM 5 pounds per hour or 25 pounds per day, VOC 3 pounds per hour or 15 pounds per day:
 - (1) One (1) dip tank (DT-3) using water dye dip. [326 IAC 2-2]
 - (2) One (1) natural gas fired incinerator, with a design waste capacity of 300

lb/hour, equipped with primary and secondary burners, used for disposal of waste including but not limited to paint off of buckets, non-hazardous water-based adhesives, and other non-hazardous wastes. [326 IAC 4-2-2]

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 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 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.3 Enforceability [326 IAC 2-7-7]

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

B.4 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.5 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.6 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.7 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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee may include a claim of confidentiality in accordance with 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 may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification 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. One (1) certification can cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 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 appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) 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.11 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 (PMPs) 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; and
- (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 PMPs 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

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The submittal of the PMPs does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile, 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). 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)(10) 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 accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that 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 the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 or applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

- (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, 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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (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)(7)]

B.14 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.15 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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

- (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) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 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)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 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). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (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 a reasonable 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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by 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).

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

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

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any source modification required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2] [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, 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.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application 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

The application 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) 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.24 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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]
The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.3 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.8 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61]

- (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 applicable 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 applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures 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 protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(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 IDEM, OAM, 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.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

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

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

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance, or by a later date specified by an applicable requirement. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for 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).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins, or by a later date specified by an applicable requirement.

C.13 Monitoring Methods [326 IAC 3]

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

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

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

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

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

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

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

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

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

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

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

- (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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (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.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-1.1-11]

- (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. 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 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.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 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 information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Wood coating spray booths and dip tanks, including:

- (1) Thirty-six (36) spray coating booths, identified as 1 through 32 and 34 through 37, using dry filters (booths 1 through 32 and 34 through 36) and baffles (booth 37) for particulate matter control;
- (2) One (1) coating dip tank, identified as station 33;
- (3) One (1) Automated Flat Line Finishing System, identified as SB-38;

(Insignificant Activity): One (1) dip tank (DT-3) using water dye dip.

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

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

Pursuant to Permit Modification T117-12544-00004, issued August 31, 2000:

- (a) Volatile organic compound (VOC) emissions from all of the surface coating facilities shall be limited to less than 246 tons per twelve consecutive month period.
- (b) This emission limit and the associated record keeping requirements limit the potential to emit (PTE) of VOC for the source to less than 250 tons per year. Compliance with these conditions makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

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 by the Automated Flat Line Finishing System (SB-38) installed in 1998 and the side draft spray booth (3) installed in 2000, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one of the following application methods:

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

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

D.1.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

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

D.1.4 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

- (a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 21, 1997. A copy of this rule is attached.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
- (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; 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 any combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives as follows:
- (A) Use compliant contact adhesives as follows:
- (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
- (ii) 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;
- or
- (B) 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, as applied.

D.1.5 Work Practice Standards [40 CFR 63.803]

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

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

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from each of the coating spray booths and the Automated Flat Line System shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate from one hundred (100) pounds per hour 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.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.8 VOC Emission Determination [326 IAC 2-2] [40 CFR 52.21]

Pursuant to Permit Modification T117-12544-00004, issued August 31, 2000, to document compliance with Condition D.1.1, the Permittee shall maintain complete and sufficient records as follows:

- (a) The amount and VOC content of each coating material and solvent used.
- (b) The total VOC emissions for each month. VOC emissions for each month shall be determined through a mass balance calculation whereby VOC emissions equal the sum of VOC inventory at the beginning of the month plus any VOC received onsite during the month, minus the sum of VOC remaining in inventory at the end of the month and any unused VOC transferred offsite during the month. The VOC content of waste shipped offsite for disposal may also be deducted in calculating the total VOC emissions, if desired.
- (c) Compliance with Condition D.1.1 shall be demonstrated within thirty (30) days of the end of each month based on the total calculated VOC emissions for the most recent twelve (12) month period.

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

- (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 these facilities by this permit.

D.1.10 VOC and VHAP Limitations [326 IAC 8-1-2] [326 IAC 8-1-4] [40 CFR 63.804 and 63.805]

Compliance with the VOC and VHAP limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.11 Operator Training for PM Control

- (a) The Permittee shall implement an operator-training program:
- (1) All operators of spray coating booths shall be trained in the proper setup and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, proper baffle placement and configuration, filter and baffle inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Particulate Matter (PM)

The dry filters and baffles for particulate matter (PM) overspray control shall be properly in place and maintained to ensure integrity of the filters and baffles, and particulate loading of the filters, at all times when the paint booths are in operation.

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and Condition D.1.8, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VOC emission limit and VOC emission determination requirements established in Conditions D.1.1 and D.1.8.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include:
 - (A) Purchase orders, invoices, and any other tracking records necessary to verify the amount of each product received onsite and any shipped offsite, and the amount of each product dispensed from inventory to the coating area and any returned to inventory from the coating area, and
 - (B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material used.
 - (2) The amount of VOC drummed and shipped offsite each month for disposal as waste, if the waste VOC is deducted from the total reported VOC usage. Records shall include:

- (A) The amount and VOC content of each used coating material and solvent collected for disposal offsite. Records shall include Hazardous Waste Reclamation Record sheets, or equivalent, with an entry made each time additional material is placed in a waste collection drum. Each entry shall note the complete product name or product number of the material and the quantity of material placed in the drum.
 - (B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material placed in the drum.
- (3) 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 VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth 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.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Conditions D.1.11 and D.1.12, the Permittee shall maintain a copy of the operator-training program, training records, 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.1.14 Reporting Requirements: PSD Minor Limit

- (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 their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Records used to determine VOC emissions shall include the coating, thinner and clean up solvent usage, material safety data sheets (MSDS) and any additional information necessary to determine the VOC content, and the date of use. Records used to determine the VOC content of waste drummed and shipped offsite shall include the Hazardous Waste Reclamation Record sheets, or equivalent, with an entry for each addition to the waste collection drum, if the waste VOC is deducted from the reported VOC emissions.

- (c) A material safety data sheet (MSDS) and any additional information necessary to determine the VOC content for each coating and solvent shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.

D.1.15 Reporting Requirements: NESHAP

- (a) A semi-annual Continuous Compliance Report to document compliance with Conditions D.1.4 and D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported, on a calendar year basis with the reporting periods ending June 30 and December 31.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
 - (2) July 1 through December 31.
- (b) The report required in (a) 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)]; Insignificant Activity [326 IAC 2-7-1(21)]: The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Woodworking operations, including a scrap wood grinding process, with six (6) baghouses for particulate matter control, exhausting to stacks MBH-1, MBH-2, MBH-3, TBH-1, TBH-2, and PBHV-1. Sawdust from the baghouse silos is conveyed into closed semi-trailers. Wood chips from the grinder are transferred pneumatically and collected by cyclone.

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

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

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall be calculated with the following equation:

Interpolation of the data for the process weight rate from one hundred (100) pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

At a process weight rate of 6177 pounds per hour, the allowable PM emission rate shall not exceed 8.728 pounds per hour.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

D.2.5 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]

Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

- (a) The baghouse shall be inspected.
- (b) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.2.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

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

D.2.7 Broken or Failed Bag Detection

In the event of a bag failure that causes the baghouse to emit visible emissions:

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

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

D.2.8 Record Keeping Requirements [326 IAC 2-7-1(21)(G)(xxix)(GG)]

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission observations of each baghouse stack exhaust.
- (b) To document compliance with Conditions D.2.5 and D.2.6, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.6 and the dates the vents are redirected.
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).
- (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)]; Insignificant Activity [326 IAC 2-7-1(21)]: The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) natural gas fired incinerator, with a design waste capacity of 300 lb/hour, equipped with primary and secondary burners, used for disposal of waste including but not limited to paint off of buckets, non-hazardous water-based adhesives, and other non-hazardous wastes.

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

D.3.1 Incinerators [326 IAC 4-2-2]

(a) Pursuant to 326 IAC 4-2-2 (Incinerators), all incinerators shall:

- (1) consist of primary and secondary chambers or the equivalent;
- (2) be equipped with a primary burner unless burning wood products;
- (3) comply with 326 IAC 5-1 and 326 IAC 2;
- (4) be maintained properly as specified by the manufacturer and approved by the commissioner;
- (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (7) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (8) not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter (PM) per one thousand (1,000) pounds of dry exhaust at standard conditions corrected to fifty percent (50%) excess air;
- (9) not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

(b) All incineration shall comply with all other state and local laws and regulations. (D.3.1(b) is not federally enforceable.)

D.3.2 Carbon Monoxide Emission Limits [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2(3) (Carbon Monoxide Emission Limits), no person shall cause or allow the discharge of carbon monoxide from refuse incineration or burning equipment, unless the waste gas stream is burned in a direct-flame afterburner or is controlled by other means approved by the commissioner. 326 IAC 9-1-2 is not federally enforceable.

Additional Requirements

There are no Compliance Determination, Compliance Monitoring, Record Keeping or Reporting requirements for this unit at this time, other than the general Section B and C reporting requirements.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Springs Valley Manufacturing
A Division of Kimball International, Inc.
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469
Part 70 Permit No.: T117-7357-00004

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 Affidavit (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 BRANCH
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 OCCURRENCE REPORT**

Source Name: Springs Valley Manufacturing
A Division of Kimball International, Inc.
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469
Part 70 Permit No.: T117-7357-00004

This form consists of 2 pages

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- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">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); andC The Permittee must submit notice by mail or facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? 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:
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: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

VOC Emissions - PSD Minor Limit

Source Name: Springs Valley Manufacturing
A Division of Kimball International, Inc.
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469
Part 70 Permit No.: T117-7357-00004
Facility: surface coating
Parameter: VOC
Limit: Less than 246 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT Semi-Annual Continuous Compliance Report Wood Furniture NESHP

Source Name: Springs Valley Manufacturing
 A Division of Kimball International, Inc.

Source Address: 8831 West State Road 56, West Baden Springs, IN 47469

Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469

Part 70 Permit No.: T117-7357-00004

Facility: Surface Coating and Adhesive Application

Parameter: VOC and VHAPs - NESHP

Limit:

- (1) Finishing operations: 1.0 pound VHAP/pound 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 pounds VHAP/pound solids
- (5) All other contact adhesives: 1.0 pound VOC VHAP/pound solids
- (6) Strippable spray booth material: 0.8 pound VOC per pound solids
- (7) The work practice implementation plan is being followed.

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 six month period.

9 Deviation/s occurred in this six month period.

Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____

Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Springs Valley Manufacturing
A Division of Kimball International, Inc.
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469
Part 70 Permit No.: T117-7357-00004

Months: _____ to _____ Year: _____

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<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

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

Source Name: **Springs Valley Manufacturing
A Division of Kimball International, Inc.**
Source Location: **8831 West State Road 56, West Baden Springs, Indiana 47469**
County: **Orange**
SIC Code: **2511, 2517, 2599, 3949**
Operation Permit No.: **T117-7357-00004**
Permit Reviewer: **Vickie Cordell**

On November 1, 2000, the Office of Air Management (OAM) had a notice published in the Paoli News-Republican, Paoli, Indiana, stating that Springs Valley Manufacturing had applied for a Part 70 Operating Permit to operate a wood furniture manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 5, 2000, Springs Valley Manufacturing (SVM) submitted the following comments on the proposed Part 70 permit. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted.

Comment 1:

Please change the "Responsible Official" to Dale Lassiter. Dale is the Operations Manager for SVM and has day to day responsibility.

Response:

The Responsible Official has been changed in Condition A.1 of the permit, as follows:

Responsible Official: ~~Chris Thyen, Vice President~~ **Dale Lassiter, Operations Manager**

Comment 2:

Regarding Condition B.15 Deviation - There is no need for a quarterly CERTIFIED report of deviations if no deviation has occurred. This section should be changed to require certified reports ONLY if a deviation is being reported. Section B.10 Annual Compliance Certification already requires the submission of a certified compliance report addressing the compliance status of the source. Requiring quarterly reporting as well as annual reporting of the same information is duplicative and unnecessary.

Response:

The Federal Part 70 Operating Permit rules state that all reports shall be certified. Previous versions of the Title V permits required notification of the Office of Air Management within 10 days whenever a deviation occurred. However, since the deviation reports must be certified, the OAM Compliance Section has removed the 10-day reporting requirement. The Compliance Section now requires sources to report any deviations on the Quarterly Deviation and Compliance Monitoring Report that was already required to be submitted. No changes have been made as a result of this comment.

Comment 3:

Regarding Condition C.20 General Reporting Requirements, part (d) - The second sentence of this condition contradicts Condition D.1.14 Reporting Requirements part (a). Specifically, C.20 states that the reports do NOT require the certification by the responsible official. Condition D.1.14 states that the report DOES require the certification by responsible official.

Response:

As noted in the Response to Comment 2, the Federal Part 70 Operating Permit rules require that all submissions required in Title V permits be certified. (An exception has been made for the Emergency Occurrence Report Form.) Part (d) of Condition C.20 has been revised as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. In Condition B.16, Permit Modification, Reopening, Revocation and Reissuance, or Termination, references to a local permitting authority were inadvertently included in part (d). There is no local agency that issues air approvals for Orange County. Therefore, this wording has been deleted:

B.16 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]

- (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, ~~(or local agency when applicable)~~ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, ~~(or local agency when applicable)~~ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]
2. As detailed above, all submittals required in the Title V permit are required to be certified by the Responsible Official. Therefore, the following statement has been added at the bottom of the PSD Minor Limit report form, page 38, and the Wood Furniture NESHAP report form, page 39:

Attach a signed certification to complete this report.

3. As stated in the permit, the surface coating facilities are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ. In order to certify to the work practice implementation plan provision of the NESHAP, 40 CFR 63.804(g), the work practice plan must be included on the NESHAP report form. Therefore, Condition D.1.15 part (a) and the NESHAP report form have been amended as follows:

D.1.15 Reporting Requirements: NESHAP

- (a) A semi-annual Continuous Compliance Report to document compliance with Conditions D.1.4 **and D.1.5** and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported, on a calendar year basis with the reporting periods ending June 30 and December 31.

PART 70 OPERATING PERMIT
Semi-Annual **Continuous Compliance** Report
~~VOC and VHAP Usage~~ = Wood Furniture NESHAP

Source Name: Springs Valley Manufacturing
A Division of Kimball International, Inc.
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469
Part 70 Permit No.: T117-7357-00004
Facility: Surface Coating and Adhesive Application
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations: 1.0 pound VHAP/pound 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 pound VHAP/pound solids
(5) All other contact adhesives: 1.0 pound VHAP/pound solids
(6) Strippable spray booth material: 0.8 pound VOC per pound solids
(7) **The work practice implementation plan is being followed.**

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: Springs Valley Manufacturing,
A Division of Kimball International, Inc.
Source Location: 8831 West State Road 56, West Baden Springs, IN 47469
County: Orange
SIC Code: 2511, 2521, 2434, 2517
Operation Permit No.: T 117-7357-00004
Permit Reviewer: Vickie Cordell

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Springs Valley Manufacturing relating to the operation of a wood furniture manufacturing operation. A draft permit was available for public review in the fall of 1998; however, due to numerous changes a revised draft Part 70 permit and new Technical Support Document have been prepared for a second public notice period.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Wood coating spray booths and dip tanks, including:
 - (1) Thirty-seven (37) spray coating booths, identified as 1 through 32 and 34 through 37, using dry filters for particulate matter control;
 - (2) One (1) coating dip tank, identified as station 33;
 - (3) One (1) Automated Flat Line Finishing System, identified as SB-38;
- (b) Woodworking operations, including a scrap wood grinding process, with six (6) baghouses for particulate matter control, exhausting to stacks MBH-1, MBH-2, MBH-3, TBH-1, TBH-2, and PBHV-1. Sawdust from the baghouse silos is conveyed into closed semi-trailers. Wood chips from the grinder are transferred pneumatically and collected by cyclone.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

Replacement of original spray booth 3 with a side draft booth also identified as booth 3, using dry filters for particulate matter control. Use of the side draft booth will reduce the possibility of dust contamination in the wet finish, thereby reducing the need for rework/repair of the product. There is no increase in PTE due to this change. This booth is included in the existing source-wide VOC limit for the surface coating facilities.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Combustion source flame safety purging on startup.
- (c) Closed loop heating and cooling systems.
- (d) Infrared cure equipment.
- (e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) On-site fire and emergency response training approved by the department.
- (k) Other emergency equipment as follows: stationary fire pumps.
- (l) Filter or coalescer media changeout.
- (m) Other activities or categories not previously identified with potential, uncontrolled emissions equal to or less than thresholds require listing only. Pb 0.6 ton per year or 3.29 pounds per day, SO₂ 5 pounds per hour or 25 pounds per day. NO_x 5 pounds per hour or 25 pounds per day, CO 25 pounds per day, PM 5 pounds per hour or 25 pounds per day, VOC 3 pounds per hour or 15 pounds per day:
 - (1) One (1) dip tank (DT-3) using water dye dip;
 - (2) One (1) natural gas fired incinerator, with a 300 lb/hour waste capacity, equipped with primary and secondary burners, used for disposal of waste including but not limited to paint off of buckets, non-hazardous water-based adhesives, and other non-hazardous wastes.

Existing Approvals

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

Operation Permits 59-10-90-0051 and 59-10-90-0052, issued March 9, 1987, and 59-10-90-0053 and 59-10-90-0054, issued September 3, 1987;

Amendment to Operation Permits 59-10-90-0051 and 59-10-90-0052, issued September 3, 1987, and Amendment A-117-6320-00004 (name change only), issued August 26, 1996;

Construction Permits PC (59)1806, issued October 4, 1990, and CP-117-9836-00004, issued August 18, 1998;

Registration CP 117-2523, issued June 18, 1992;

Permit by Rule: Incinerator Notification, received April 14, 1989;

Permit Modification T117-12544-00004, issued August 31, 2000.

Note: Some of these permits were issued under the source's former name, Kimball Piano Division.

All conditions from previous approvals were incorporated into this Part 70 permit unless already superceded in an Amendment or Permit Modification.

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 December 4, 1996. Additional information was received on October 6, 1998. Comments on previous versions of the draft Title V permit were received from the source on November 18, 1998; April 19, 1999, and November 16, 1999.

A notice of completeness letter was mailed to the source on December 6, 1996.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE **before controls**. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100, less than 250
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
Ethyl Benzene	less than 10
Formaldehyde	less than 10
Glycol Ether	less than 10
Methyl Alcohol	less than 10
Methyl Ethyl Ketone	less than 10
Methyl Isobutyl Ketone	less than 10
Methylene Chloride	less than 10
Toluene	greater than 10
Xylene	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	6
PM-10	0.2
SO ₂	not reported
VOC	115
CO	not reported
NO _x	not reported
HAPs	22

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit. Emissions are based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited: the PM and PM-10 shown for the surface coating and wood working are the PTE after controls; the HAPs total is the uncontrolled PTE; and the VOC is as limited):

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
all existing surface coating	12.5	12.5	0.0	246.0	0.0	0.0	63.3
wood working operations*	38.2	38.2	0.0	0.0	0.0	0.0	0.0
insignificant activities, including natural gas combustion **	6.7	6.7	0.3	3.0	11.9	56.5	0.0
Total Emissions	<250	<250	<250	249	<250	<250	>25

* PM from this process is limited by 326 IAC 6-3 (Process Operations). PM-10 is not directly limited by any rule. However, there is no condensible PM-10 from the woodworking operations; all the PM-10 is filterable and therefore would be considered PM pursuant to 326 IAC 6-3.

**The individual natural gas combustion units are not considered significant emission units pursuant to Title V. However, the VOC emissions were taken into consideration in establishing the source-wide 249 tons/year VOC limit and the resulting 246 tons/year surface coating VOC limit.

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

County Attainment Status

The source is located in Orange County.

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

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

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:

- (a) 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.
- (b) 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) This source is not subject to the Prevention of Significant Deterioration (PSD) requirements (326 IAC 2-2, 40 CFR 52.21) because the total source potential to emit VOC is limited to less than 250 tons per year.
- (b) There are no New Source Performance Standards (326 IAC 12, 40 CFR Part 60) applicable to this source.
- (c) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the wood furniture coating operations except when otherwise specified in 40 CFR 63 Subpart JJ.

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 (National Emission Standards for Wood Furniture Manufacturing Operations)), with a compliance date of December 7, 1998.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; 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 any combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives as follows:
 - (A) Use compliant contact adhesives as follows:
 - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
 - (ii) 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;or
 - (B) Use a control device to limit emissions to one (1.0) for existing 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.

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). 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.

State Rule Applicability - Entire Source

326 IAC 2-1-3.4 (New Source Toxics Control)

This rule was not applied to the Automated Flat Line Finishing System because this rule is satisfied by the wood furniture NESHAP.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

State Rule Applicability - Surface Coating Facilities

326 IAC 2-2 (PSD Minor Limit)

Pursuant to Permit Modification T117-12544-00004, issued August 31, 2000:

- (a) Volatile organic compound (VOC) emissions from all of the surface coating facilities shall be limited to less than 246 tons per twelve consecutive month period.

- (b) This emission limit and the associated record keeping requirements limit the potential to emit (PTE) of VOC for the source to less than 250 tons per year. Compliance with these conditions makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

(Note: this is Condition D.1.1 in the Title V permit, and is referred to in the two following conditions.)

326 IAC 2-2 (VOC Emission Determination)

Pursuant to Permit Modification T117-12544-00004, issued August 31, 2000:

To document compliance with Condition D.1.1, the Permittee shall maintain complete and sufficient records as follows:

- (a) The amount and VOC content of each coating material and solvent used.
- (b) The total VOC emissions for each month. VOC emissions for each month shall be determined through a mass balance calculation whereby VOC emissions equal the sum of VOC inventory at the beginning of the month plus any VOC received onsite during the month, minus the sum of VOC remaining in inventory at the end of the month and any unused VOC transferred offsite during the month. The VOC content of waste shipped offsite for disposal may also be deducted in calculating the total VOC emissions, if desired.
- (c) Compliance with Condition D.1.1 shall be demonstrated within thirty (30) days of the end of each month based on the total calculated VOC emissions for the most recent twelve (12) month period.

326 IAC 8-1-2 and 326 IAC 8-1-4 (VOC and VHAP Limitations)

Compliance with the VOC and VHAP limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

326 IAC 8-2-1 (Surface Coating Emission Limitations: Applicability)

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

Pursuant to 326 IAC 8-2-1(a)(1 through 3) (Surface Coating Emission Limitations: Applicability), wood furniture and cabinet coating is not described in sections 2 through 8 or section 11 of this rule, and the source is located in Orange county; therefore none of the facilities are subject to 326 IAC 8-2 under these portions of the rule. Pursuant to 326 IAC 8-2-1(a)(4), the surface coating spray booths (1 through 32 and 34 through 37) and the dip tank (station 33) were all installed prior to July 1, 1990; therefore, these facilities are not subject to 326 IAC 8-2 under this portion of the rule. However, the original spray booth 3 is being replaced in 2000 with a new side draft booth to reduce the possibility of dust contamination in the wet finish, and the Automated Flat Line Finishing System was installed in 1998. Consequently, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) is applicable to these two units but does not apply to any of the other booths or the dip tank.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by the Automated Flat Line Finishing System (SB-38) installed in 1998 and the side draft spray booth (3) installed in 2000, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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.

The Automated Flat Line Finishing System uses air-assisted airless spray guns and booth 3 will use air-assisted airless or HVLP spray guns; therefore, both are in compliance with this rule.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

The surface coating facilities that are not subject to 326 IAC 8-2-12 were evaluated pursuant to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules).

- (a) The surface coating spray booths 1, 2, 4 through 22, and 34 through 37 were installed prior to 1970 and no modifications have been made to these facilities on or after January 1, 1980, therefore these facilities are not subject to 326 IAC 8-1-6.
- (b) Spray booths 23 through 32, installed in 1987, and dip tank 33, installed in 1989, are subject to 326 IAC 8-1-6 because the potential VOC emissions from each facility are greater than 25 tons per year.

The BACT analysis for booths 23 - 32 required the source to submit a study to evaluate the effect of application methods on finishing material usage at the plant. The study found that no alternative application methods were feasible at that time.

No formal BACT analysis was done for the dip tank permit issued on October 4, 1990. However, the use of a dip tank rather than a spray booth has generally been accepted as BACT for this type of operation because of the maximum transfer efficiency. The intent of the BACT requirement is to reduce VOC emissions as much as possible in a way that is environmentally sound and economically feasible for the source. In this case, that intent is met by the use of a dip tank for coating application, and by restricting the overall VOC emissions. This facility is now included in the 249 tons per year source-wide VOC limit.

- (c) The Automated Flat Line Finishing System (SB-38) installed in 1998 and the replacement spray booth 3 installed in 2000 are subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) and therefore are not subject to the provisions of 326 IAC 8-1-6 (General Provisions Relating to VOC Rules).

State Rule Applicability - Surface Coating Facilities and Woodworking Operations

326 IAC 6-3-2 (Process Operations)

The PM from each of the coating spray booths and the Automated Flat Line System shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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:

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the wood working operations shall not exceed 8.728 pounds per hour when operating at a process weight rate of 6,177 pounds per hour. The pounds per hour limitation was calculated with the above equation.

The source chose operator training requirements in place of compliance monitoring to demonstrate compliance with 326 IAC 6-3 for the surface coating facilities. This option makes the proper placement and maintenance of the dry filters and baffles a Compliance Determination requirement.

Operator Training for PM Control

- (a) The Permittee shall implement an operator-training program:
 - (1) All operators of spray coating booths shall be trained in the proper setup and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Particulate Matter (PM)

The dry filters and baffles for particulate matter (PM) overspray control shall be properly in place and maintained to ensure integrity of the filters and baffles, and particulate loading of the filters, at all times when the paint booths are in operation.

State Rule Applicability - Woodworking Operations

The source has chosen to have the woodworking operations permitted as an insignificant activity pursuant to 326 IAC 2-7-1(21)(G)(xxix).

326 IAC 2-7-1(21)(G)(xxix) (Baghouse Limitations)

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).

326 IAC 2-7-1(21)(G)(xxix) (Particulate Matter (PM))

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

326 IAC 2-7-1(21)(G)(xxix) (Visible Emissions Observations)

Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

- (a) The baghouse shall be inspected.
- (b) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

State Rule Applicability - Incinerator

326 IAC 4-2-2 (Incinerators)

- (a) Pursuant to 326 IAC 4-2-2 (Incinerators), all incinerators shall:
 - (1) consist of primary and secondary chambers or the equivalent;
 - (2) be equipped with a primary burner unless burning wood products;
 - (3) comply with 326 IAC 5-1 and 326 IAC 2;
 - (4) be maintained properly as specified by the manufacturer and approved by the commissioner;
 - (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
 - (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
 - (7) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
 - (8) not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter (PM) per one thousand (1,000) pounds of dry exhaust at standard conditions corrected to fifty percent (50%) excess air;
 - (9) not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

- (b) All incineration shall comply with all other state and local laws and regulations. ((b) is not federally enforceable.)

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

Pursuant to 326 IAC 9-1-2(3) (Carbon Monoxide Emission Limits), no person shall cause or allow the discharge of carbon monoxide from refuse incineration or burning equipment, unless the waste gas stream is burned in a direct-flame afterburner or is controlled by other means approved by the commissioner. 326 IAC 9-1-2 is not federally enforceable.

Compliance Requirements

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

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

The woodworking has applicable compliance monitoring conditions as follows:

Broken or Failed Bag Detection

In the event of a bag failure that causes the baghouse to emit visible emissions:

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

These monitoring conditions are necessary because the baghouses 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 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this wood furniture manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T117-7357-00004**.