

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

**Superior Wood Products
1058 West CR 400 North
Warsaw, Indiana 46580**

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

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

Operation Permit No.: T085-7425-00072	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary custom made wood kitchen cabinet manufacturing operation.

Responsible Official: **Bruce Korenstra, Pres.**
Source Address: **1058 West CR 400 North, Warsaw, IN 46580**
Mailing Address: **1058 West CR 400 North, Warsaw, IN 46580**
SIC Code: **2434**
County Location: **Kosciusko**
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules
Major Source, Part 70 Permit Program

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

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

- (a) Three (3) spray booths identified as EU-1, EU-2, and EU-3, utilizing HVLP spray guns, each booth with a maximum capacity of 3.23 units per hour. Emissions shall be controlled by dry filters for overspray control and exhausted at stacks S1, S2, and S3.
- (b) A woodworking shop, with cyclones, baghouses, and internal portable dust collectors for particulate control. One cyclone is exhausted inside through two baghouses; additional woodworking emissions are exhausted at stacks S4, S5, and S6.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21), that have applicable requirements. Insignificant activities include the following:

- (a) Natural gas-fired combustion unit(s) with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term and condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)][326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

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

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

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit;
or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit under 326 IAC 2-7-9(a) shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

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

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints in Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee:

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

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3]

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

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

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

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

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

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

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

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

C.15 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. This annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purpose of part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. This emission statement must be submitted to:

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

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

C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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

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

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

C.19 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)] Three (3) spray booths identified as EU-1,EU-2, and EU-3, utilizing HVLP spray guns, each booth with a maximum capacity of 3.23 units per hour. Emissions shall be controlled by dry filters for overspray control and exhausted at stacks S1, S2, and S3.

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

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

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

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

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

D.1.2 Particulate Matter [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from each spray booth shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, 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
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

A copy of this rule is enclosed.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.5 Work Practice Standards [40 CFR 63.803]

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

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

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1)(6)] [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the (PM) limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 HAP Content

Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Condition D.1.3 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

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

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the paint booths (EU-1, EU-2, and EU-3) are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, 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.1.3.

- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) 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.
 - (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.1.3, and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3, and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
 - (2) July 1 through December 31.
- (c) The reports required in (a) and (b) of this condition shall be submitted to:

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

and

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] A woodworking shop with cyclones, baghouses, and internal portable dust collectors for particulate control. One cyclone is exhausted inside through two baghouses; additional woodworking emissions are exhausted at stacks S4, S5, and S6.

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 2.57 pounds per hour when operating at a process weight rate of 1000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1)(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The cyclones, baghouses, and internal portable dust collectors for PM control shall be in operation at all times when the woodworking shop is in operation and exhausting to the outside atmosphere.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when vented to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Baghouse Inspections

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

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the wood working stack exhaust when exhausting to the outside atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Superior Wood Products
Source Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Mailing Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Part 70 Permit No.: T085-7425-00072

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Superior Wood Products
Source Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Mailing Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Part 70 Permit No.: T085-7425-00072

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

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

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

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

Source Name: Superior Wood Products
 Source Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 Mailing Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 Part 70 Permit No.: T085-7425-00072
 Facility: Surface Coating
 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 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

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: _____

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

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Superior Wood Products
 Source Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 Mailing Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 Part 70 Permit No.: T085-7425-00072

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review

Background And Description

Source Name: Superior Wood Products
Source Location: 1058 West CR 400 North, Warsaw, Indiana 46580
County: Kosciusko
SIC Code: 2434
Operation Permit No.: T085-7425-00072
Permit Reviewer: Vickie Cordell

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Superior Wood Products relating to the operation of a stationary custom made wood kitchen cabinet manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

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

The source consists of the following unpermitted emission units and pollution control devices, all installed in September, 1990:

- (a) Three (3) spray booths identified as EU-1, EU-2, and EU-3, utilizing HVLP spray guns, each booth with a maximum capacity of 3.23 units per hour. Emissions shall be controlled by dry filters for overspray control and exhausted at stacks S1, S2, and S3.
- (b) A woodworking shop, with cyclones, baghouses, and internal portable dust collectors for particulate control. One cyclone is exhausted inside through two baghouses; additional woodworking emissions are exhausted at stacks S4, S5, and S6.

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

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

Insignificant Activities

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

- (a) Natural gas-fired combustion unit(s) with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

Enforcement Issues

- (a) IDEM is aware that the equipment listed above been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 11, 1996.

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

Emission Calculations

The woodworking emission calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document. See Appendix A of this document for detailed surface coating emissions calculations (2 pages).

Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	greater than 100
PM-10	less than 100
SO ₂	less than 100
VOC	less than 100
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)
Toluene	less than 10
Methanol	less than 10
Methyl Isobutyl Ketone	less than 10
Glycol Ethers	less than 10
Xylene	greater than 10
Formaldehyde	less than 10
TOTAL	greater than 25

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

Actual Emissions

The following table shows the actual emissions from the source. This information was provided in the permit application, no emission statements are available for the source.

Pollutant	Actual Emissions (tons/year)
PM	0.8
PM-10	no data available
SO ₂	no data available
VOC	5.6
CO	no data available
HAP (Xylene/ Source Total)	1.4 / 2.6
NO _x	no data available

County Attainment Status

The source is located in Kosciusko County.

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

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

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1988. This NESHAP has not applied to the source in the past, therefore, a copy of the federal rule will be enclosed with the permit.

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 VHAP content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) The source shall complete a work practice implementation plan within sixty (60) calendar days after the source's compliance date as specified in 40 CFR 63.803. The plan must detail how the source will incorporate environmentally desirable practices into the operation.
- (5) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating.

State Rule Applicability - Entire Source

326 IAC 2-6 and 2-7 (Emission Reporting)

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

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

326 IAC 5-1 (Visible Emissions Limitations)

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

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

This condition is not federally enforceable.

326 IAC 4-1, IC 13-17-9 (Open Burning)

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

326 IAC 4-2, 326 IAC 9-1-2 (Incineration)

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 2-7-6(6) (Operation of Equipment)

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

326 IAC 14-10, 326 IAC 18 (Asbestos Abatement Projects - Accreditation)

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

State Rule Applicability - Individual Facilities

326 IAC 8-2-1(a)(3); 326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-1(a)(3) and 326 IAC 8-2-12 (Volatile Organic Compounds (VOC)), the surface coating applied to wood furniture and cabinets in Paint Booth EU-3 shall utilize one of the application methods listed below in this condition. Pursuant to 326 IAC 8-2-1(a)(3) and 326 IAC 8-2-12, if the actual emissions from the Paint Booth EU-1 or from Paint Booth EU-2 should exceed fifteen (15) pounds of VOC per day before add-on controls, then the following shall be applicable to that facility:

The surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

This control technology shall be used at all times that Paint Booth EU-3 is operated.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule is not applicable because the potential VOC emissions are less than 100 tons per year.

326 IAC 6-3-2(c) (Particulate Matter)

- (a) Pursuant to 326 IAC 6-3-2(c)(Process Operation), the allowable PM emission rate from each of the Paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) Pursuant to 326 IAC 6-3-2(c)(Process Operation), the allowable PM emission rate from the woodworking facilities shall not exceed 2.57 pounds per hour when operating at a process weight rate of 1000 pounds per hour.

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

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

Compliance Requirements

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

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

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

- (a) The dry filters for PM control shall be in operation at all times when the paint booths EU-1, EU-2, and EU-3 are in operation.

(b) Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) Visible Emissions Notations

Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when vented to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(e) Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

(f) Broken Bag or Failure Detection

In the event that bag failure has been observed:

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 Preventive Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventive Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

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

Hazardous Air Pollutant (HAP) Emissions

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

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (page 2 of Appendix A).

Conclusion

The operation of this wood molding surface coating operation will be subject to the conditions of the attached proposed **Part 70 Permit No. T085-7425-00072**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Superior Wood Products
Source Location: 1058 West CR 400 North, Warsaw, Indiana, 46580
County: Kosciusko County
SIC Code: 2434
Operation Permit No.: T085-7425-00072
Permit Reviewer: Vickie Cordell

On December 5, 1997, the Office of Air Management (OAM) had a notice published in the Times Union, Warsaw, Indiana, stating that Superior Wood Products had applied for a Part 70 Operating Permit to operate a custom made wood kitchen cabinet manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 15, 1997, DeRolf Environmental Consulting Agency, Inc. (DECA) submitted comments on the proposed Part 70 permit on behalf of Superior Wood Products. The summary of the comments is as follows (additions to the permit and TSD are bolded for emphasis):

Comment 1:

Please modify Conditions C.8 (Asbestos Abatement Projects - Accreditation) and C.15 (Asbestos Abatement Projects) to allow for a one time certification of the absence of asbestos on the property in lieu of requiring an asbestos inspection for every renovation. This source does not contain any asbestos.

Response to Comment 1:

326 IAC 14-10 requires a thorough inspection of the affected facility or part of the facility by an Indiana accredited asbestos inspector. It is unlikely that a source would find it cost-effective to have an entire property thoroughly inspected for asbestos. Only schools with students in any grade from kindergarten through grade 12 are required to have a thorough inspection of the entire property. Thorough inspection includes analysis of any material that may contain asbestos. This could include cement walls, linoleum floor covering and counter tops, ceiling and wall panels, roofing, pipe wrap, and more. In addition, there would be no assurance that no asbestos-containing material has been added since the inspection. Many materials currently on the market are legally allowed to contain asbestos. Finally, asbestos-containing material that was determined at one time to be non-friable may deteriorate with time and become friable. Therefore, no change was made to these conditions as a result of this comment.

Comment 2:

Please remove Conditions C.9 (Performance Testing) and C.18 (Actions Related to Noncompliance Demonstrated by a Stack Test). There are no requirements for testing applicable to this source; inclusion of these conditions may confuse some persons that some kind of testing is required.

Response to Comment 2:

Two of the compliance demonstration options included in the wood furniture NESHAP (40 CFR 63 , Subpart JJ) require performance testing. If the Permittee elects to use one of these options, testing must be conducted in accordance with the NESHAP and 326 IAC 3-6. In addition, if the OAM requests, compliance with the limits specified in Conditions D.1.2 and D.1.3 shall be determined by performance tests. Therefore, no change has been made to Condition C.9 and or Condition C.18 as a result of this comment; C.18 has been renumbered C.14. No testing is being required of this source at this time; this is specifically stated in the draft in Condition D.2.3 (Testing Requirements) for the woodworking shop. For further clarity, subsection (b) of Condition D.1.6 (Testing Requirements) for the spray booths, and Condition D.2.3 have been modified as shown below. The rule cite has also been made more specific.

D.1.6 Testing Requirements [326 IAC 2-7-6(1)(6)] [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) ~~Testing of The Permittee is not required to test~~ this facility ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required **by IDEM**, compliance with the (PM) limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.2.3 Testing Requirements [326 IAC 2-7-6(1)(6)]

~~Testing of The Permittee is not required to test~~ this facility ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required **by IDEM**, compliance with the (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

Comment 3:

Please remove Conditions C.12 (Maintenance of Monitoring Equipment) and C.14 (Pressure Gauge Specifications). The compliance monitoring requirements applicable to the emission units of this source do not require any equipment. Inclusion of these condition will confuse uninformed persons as to the requirements for such equipment.

Response to Comment 3:

For the woodworking operations compliance monitoring, Superior Wood Products has chosen to do quarterly baghouse inspections rather than parametric monitoring. Therefore, proposed Conditions C.12 and C.14 are not applicable and have been removed. Subsequent conditions have been renumbered accordingly.

Comment 4:

In condition C.16(c) (Emergency Reduction Plans), please remove the last clause "...then IDEM, OAM shall supply such a plan" and replace that clause with one that reflects the requirements of the rule.

Response to Comment 4:

326 IAC 1-5-2 (Emergency Reduction Plans; Submission) requires that all persons responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant shall prepare written emergency reduction plans. The potential PM emissions from this source are greater than 100 tons per year; however, the potential to emit of PM emissions is less than 100 tons per year. Therefore, this proposed condition does not apply to Superior Wood Products and has been removed. Subsequent conditions have been renumbered accordingly.

Comments 5 and 6:

Please rewrite Condition C.21(a)(General Record Keeping Requirements). 326 IAC 2-7-5 (3)(B)(ii) says nothing about the period of time in which such records must be produced, where the records must be kept, or the type of request that requires production of the records. To include such time and space constraints exceeds the authority of OAM and would impose an excessive burden on Superior Wood Products.

Please delete Condition C.21(c)(4). 326 IAC 2-7-5(3)(B) provides no basis for this condition. Such a level of detail (in preventative maintenance records) is not appropriate to the requirements imposed on this source.

Response to Comments 5 and 6:

326 IAC 2-7-5(3)(B)(ii)(DD) states "For the purposes of complying with this subdivision, the permittee shall retain the records on-site for three (3) years and shall make them available upon request for the two (2) years following." Because the most recent three years worth of records must be kept at the source, it is reasonable to assume that such records can be produced within a short time frame when OAM staff requests such data. In OAM's experience, practical requests for compliance related records can be made available within one hour. 326 IAC 2-7-6(2) states that the permittee shall allow access to records when the inspector arrives at the source.

Condition C. 21(c) (now renumbered as C.17(c)) states:

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

326 IAC 2-7-6(1) requires each Part 70 permit to contain compliance certification, testing, monitoring, reporting, and record keeping requirements sufficient to assure compliance with the terms and conditions of a Part 70 permit consistent with section 5(3) of the Part 70 permit program rule. In addition, 326 IAC 2-7-6(5)(B) requires Part 70 permits to include a means for monitoring the compliance of the source with its standards and work practices, in accordance with section 5(3). The first sentence of (4) sets out the records that must be kept to be in compliance with Condition B.12. The second sentence of (4) is required by 326 IAC 2-7-5(3)(B). Specifically, (B)(ii) requires retention of records for all required monitoring data and support information, and support information includes calibration and maintenance records.

The header and subpart (a) of Condition C.21 (General Record Keeping) (renumbered C.17) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]~~[326 IAC 2-7-6]~~

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

Comment 7:

In Condition C.21 (General Record Keeping Requirements), please include a clause that states: "Instead of paper records, the Superior Wood Products may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review." It is not reasonable to keep paper records of the complex records of a general purpose wood coating operation. The volume of records would take up an inordinate amount of space and take an unreasonable amount of time to search for desired records.

Response to Comment 7:

326 IAC 2-7 does not restrict the media used for record keeping. By not specifically listing alternative media, the source is allowed to use the suggested alternatives without being restricted to them as long as the record keeping requirements are met. There has been no change to the condition as a result of this comment; the condition has been renumbered C.17. 40 CFR 63.10(b)(1) gives acceptable methods of keeping records required by a NESHAP; including all of the methods listed above.

Comment 8:

Please delete Condition C.23 (Compliance with 40 CFR 82 and 326 IAC 22-1); these regulations do not apply to this source.

Response to Comment 8:

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under this rule. The U.S. EPA has requested that this condition be in every Title V permit. The condition remains unchanged but has been renumbered C.19.

Comment 9:

Please change Condition D.1.2 (Particulate Matter) to read "Particulate Matter (PM) emissions (from) each spray booth shall not exceed 0.2 pounds per hour." This allowable emission rate for each booth was calculated in the application using the equation specified in 326 IAC 6-3-2(c). By explicitly stating the emission rate, confusion over interpretations that could arise in the future are precluded.

Response to Comment 9:

The Process Weight Rate can be particularly variable for spray booths. Since the process weight rate is variable a constant limit is not computed and no calculated limit is specified in the permit. Allowable emissions would be determined at the time of a stack test, if necessary. Therefore, this condition remains unchanged.

Comment 10:

Please delete Conditions D.1.8 (Particulate Matter (PM)), D.1.9 (Monitoring), and D.1.10(c) (Record Keeping Requirements). These conditions are unnecessary and more stringent than the federal requirements of 40 CFR 64.2. The conditions of D.1.9 (b) are particularly objectionable as this condition has no basis in the rules. There is no rule that requires zero opacity, and no rule that requires that there be no accumulation of coating solids on the roof or ground. In addition, it is not possible to determine when such an accumulation was deposited. This surrogate parameter fails the test of being enforceable as a practical matter. Condition C.2 (Opacity) provides an adequate surrogate parameter for this emission unit.

Response to Comment 10:

The OAM agrees that in this case, the use of dry filters may not be necessary for compliance with 326 IAC 6-3. However, the compliance monitoring of the dry filters is still used as a trigger for possible responsive action to be taken at the coating operations. 326 IAC 6-3 is a difficult rule. IDEM receives numerous complaints about overspray from this type of facility. The use and monitoring of the filters is necessary to ensure that the facility is operating correctly and that the ambient air quality standards set forth in 326 IAC 1-3 will be attained and/or maintained, and that the public health will be protected, as allowed by 326 IAC 2-1-5(a)(2).

Under normal working conditions there should be very little, if any, overspray accumulating at the exhaust points. The purpose of this condition is to require response steps be taken if overspray is detected at the exhaust points, not to indicate noncompliance with 326 IAC 6-3-2. However, the OAM believes that this purpose can be accomplished with less frequent overspray observations.

The record keeping required by Condition D.1.10(c) is needed to document compliance with Conditions D.1.8 and D.1.9. The requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits), to obtain a permit. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan.

Conditions D.1.9 and D.1.10(c) have been changed to be as follows:

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray ~~while one or more of the booths are~~ **from the surface coating booth stacks (S1, S2, S3) while one or more of the booths are** in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.10 Record Keeping Requirements

- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 11:

Please include insignificant activities identified in the application and the Technical Support Document in this section. It is possible that members of the public, or OAM or EPA personnel might not be aware that these activities have been considered, and might erroneously conclude that these activities are illegally operating without a permit.

Response to Comment 11:

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAM ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. During the development of the model Title V Operating Permit and the subsequent implementation of the program, this approach has been the consensus recommendation of both the regulated community and the OAM. In many cases future additions or deletions of insignificant activities will not require a modification of this permit. It was felt that there would be less confusion if the permit did not give the impression that the rules required every insignificant activity to be listed in the permit. Nonetheless, the OAM has added these activities to this permit in response to your request. This has no effect on future activities regarding insignificant activities. Section A.3 is now as follows:

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21), that have applicable requirements. Insignificant activities include the following:

- (a) Natural gas-fired combustion unit(s) with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

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

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

SECTION A SOURCE SUMMARY

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

2. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.
3. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.
 - (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield"**.
4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
 - (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

~~Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).~~
5. Condition B.11 (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. Subsection (a) was revised to clarify that this information is for the compliance certification report. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

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

- (c) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

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

- (d) 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.
- (e) The annual compliance certification report shall include the following:
- (1) The identification of each term and condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

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

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

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

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

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

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

(a) **This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

~~(a)~~ (b) **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.**

Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

- ~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- ~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**

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

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

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

11. The rule cite at the end of subsection (b) of Condition B.24 (Operational Flexibility) (renumbered as B.22) has been updated as follows:

326 IAC 2-7-1(~~33~~ 34).

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**

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

13. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

14. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) ~~The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

15. The original Condition C.1 (PSD Minor Source Status) has been deleted.

16. A new Condition C.1 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

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

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

17. Condition C.2 (Opacity) has been modified for consistency with the November 1, 1998 update to 326 IAC 5. The condition is now as follows:

C.2 Opacity [326 IAC 5-1]

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

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

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

~~This condition is not federally enforceable.~~

18. The last line of Condition C.3 (Open Burning) has been changed to show that portions of the rule are not federally enforceable.

~~This condition is 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.~~

19. Condition C.4 (Incineration) has been changed by **deleting** the last sentence.

~~This condition is not federally enforceable.~~

20. The last line of Condition C.5 (Fugitive Dust Emissions) has been changed to maintain consistency.

~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~

21. Condition C.6 (Operation of Equipment) has been revised to clarify the requirement.

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

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

22. Condition C.7 (Stack Height) has been revised as follows:

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

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

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

23. Conditions C.8 (Asbestos Abatement Projects - Accreditation) and C.15 (Asbestos Abatement projects) have been combined into one condition (Asbestos Abatement Projects).

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

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

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

- (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
(2) **If there is a change in the following:**

- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.
24. Condition C.9 (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

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

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

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

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

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

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

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

25. Condition C.10 (Compliance Schedule) has been revised to more closely match the rule language.

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

The Permittee:

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

26. Condition C.11 (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

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

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

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

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

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

27. Condition C.13 (Monitoring Methods) (renumbered as C.12) has been revised to clarify the requirement.

C.12 Monitoring Methods [326 IAC 3]

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

28. Condition C.17 (Compliance Monitoring Plan-Failure to Take Response Steps) (now renumbered as C.13) the following rule cites were changed and added to the title, as follows:

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(~~3~~)]
[326 IAC 2-7-6] [326 IAC 1-6]

29. Condition C.18 (Actions Related to Noncompliance Demonstrated by a Stack Test) (renumbered as Condition C.14) is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

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

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

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

30. The header and subsection (a) of Condition C.19 (Emission Statement) (now renumbered as C.15) have been revised to add more specific rule cites and to clarify the requirements for the emission statement.

C.15 Emission Statement [326 IAC 2-7-5(3)(~~C~~)(iii)]~~[326 IAC 2-7-5(7)]~~[326 IAC 2-7-19(c)]~~[326 IAC 2-6]~~

- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

31. Condition C.22 (General Reporting Requirements) (now renumbered as C.18) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions. The reporting frequency has been stated as semi-annual in subsections (a) and (d), see comments in revision 43, below.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

- ~~(a)~~ (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- ~~(b)~~ (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- ~~(c)~~ (d) Unless otherwise specified in this permit, any **semi-annual** report shall be submitted within thirty (30) days of the end of the reporting period.

- ~~(d)~~ (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

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

- ~~(f)~~ (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

32. The facility description box in each Section D is revised to include the rule citation:

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

33. Condition D.1.1 (Volatile Organic Compounds (VOC)) has been modified to avoid the need for additional record keeping. The original wording would have required that the source keep records of coating usage for Paint Booths EU-1 and EU-2 to show whether or not the actual VOC emissions from each booth exceeded 15 pounds per day. A compliant application method (HVLP) is already used in all of the booths so this would have imposed an unnecessary burden on the source.

D.1.1 Volatile Organic Compounds (VOC) ~~[326 IAC 8-2-1(a)(3)]~~ [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets in Paint Booth EU-3 shall utilize one of the **following** application methods: ~~listed below in this condition. Pursuant to 326 IAC 8-2-1(a)(3) and 326 IAC 8-2-12, if the actual emissions from the Paint Booth EU-1 or from Paint Booth EU-2 should exceed fifteen (15) pounds of VOC per day before add on controls, then the following shall be applicable to that facility.~~

~~The surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:~~

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

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

~~This control technology shall be used at all times that Paint Booth EU-3 is operated.~~

34. Condition D.1.3 (Wood Furniture NESHAP) has been amended to better reflect the language of the rule, 40 CFR 63 Subpart JJ.

D.1.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

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

35. Subsection (a)(5) of Condition D.1.10 (Record Keeping Requirements) has been amended to indicate when the subsection applies.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, 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.1.3.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) **When the averaging compliance method is used,** copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

36. Condition D.1.11 (Reporting Requirements) is revised to show where to send the reports required by the condition.

D.1.11 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.1.3, and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3, and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.
The six (6) month periods shall cover the following months:
- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (c) **The reports required in (a) and (b) of this condition shall be submitted to:**

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

and

**United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

37. Condition D.2.6 (Baghouse Inspections) has been modified to clarify that quarterly inspections are not required when the baghouse is vented into the building.

D.2.6 Baghouse Inspections

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

38. Condition D.2.7 (Broken Bag or Failure Detection) has been modified to provide clarification for the operation of single compartment baghouses, and to show that the timetable for response steps is in the Compliance Response Plan.

D.2.7 Broken or Failed Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~(b)~~ Within eight (8) hours of the determination of failure, response steps according to the timetable described in the ~~Preventive Maintenance Plan~~ **Compliance Response Plan** shall be initiated. For any failure with corresponding response steps and timetable not described in the ~~Preventive Maintenance Plan~~ **Compliance Response Plan**, response steps shall be devised within eight (8) hours of

discovery of the failure and shall include a timetable for completion. **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).

39. Section (b) of Condition D.2.8 (Record Keeping Requirements) is revised because quarterly baghouse inspections are only required when the baghouse vents to the outdoors.

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the wood working stack exhaust when exhausting to the outside atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 **and the dates the vents are redirected.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
40. The Certification Form is revised to clarify which forms require a certification. (Revised form on page 22 of this Addendum.)
41. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement. (Revised form on pages 23 and 24 of this Addendum.)
42. The Semi-Annual Report (VOC and VHAP Usage - Wood Furniture NESHAP) has been revised for clarity and to more closely follow the language of the rule. (Revised form on page 25 of this Addendum.)
43. The Quarterly Compliance Report is renamed the Semi-Annual Compliance Monitoring Report and is revised to make it easier to understand and use. The default frequency for this report was set at quarterly because most sources are required to file other reports on a quarterly basis, and keeping the same frequency was felt to be less confusing for those sources. However, Superior Wood Products has no quarterly reporting requirements. Therefore, the frequency has been changed to **semi-annual** reporting, the minimum required by 326 IAC 2-7-5(3)(C). The title and description have been changed to compliance monitoring to better describe the requirements of this form, and to reduce confusion with the Annual Compliance Certification. (Revised form on page 26 of this Addendum.)
44. The woodworking emissions calculations were inadvertently omitted from the Technical Support Document. This information has been added to this TSD Addendum as Appendix A.

No change will be made to the TSD. The OAM prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Superior Wood Products
Source Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Mailing Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Part 70 Permit No.: T085-7425-00072

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:

Annual Compliance Certification Letter

~~Emergency/Deviation Occurrence Reporting Form~~

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Superior Wood Products
Source Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Mailing Address: 1058 West CR 400 North, Warsaw, Indiana 46580
Part 70 Permit No.: T085-7425-00072

This form consists of 2 pages

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Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

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

~~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 Report VOC and VHAP Usage - Wood Furniture NESHAP

Source Name: Superior Wood Products
 Source Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 Mailing Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 Part 70 Permit No.: T085-7425-00072
 Facility: Surface Coating
 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 solvent and 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

YEAR: _____

Month	Finishing Operations (lb VHAP/lb solid)	Thinners used for on-site formulation (% by weight)	All other thinner/Solvent 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: _____

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

**PART 70 OPERATING PERMIT
~~QUARTERLY~~ SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: By Pass Paint Shop, Inc.
 Source Address: 1132 N. Nappanee Street, Elkhart, Indiana 46514
 Mailing Address: 1132 N. Nappanee Street, Elkhart, Indiana 46514
 Part 70 Permit No.: T039-6010-00058

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD: LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

<u>Compliance Monitoring Requirement</u> (e.g. Permit Condition D.1.3)	<u>Number of Deviations</u>	<u>Date of each Deviations</u>	<u>No Deviations</u>

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Response to Additional Comments to the
Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name:	Superior Wood Products
Source Location:	1058 West CR 400 North, Warsaw, Indiana, 46580
County:	Kosciusko County
SIC Code:	2434
Operation Permit No.:	T085-7425-00072
Permit Reviewer:	Vickie Cordell

Due to numerous changes to standard language for Title V permit conditions, the Office of Air Management (OAM) provided a copy of the revised Title V permit for Superior Wood Products to the source for an additional comment period. On September 21, 1998, DeRolf Environmental Consulting Agency, Inc. (DECA) submitted comments on the revised Part 70 permit on behalf of Superior Wood Products. Comments regarding the requirements for dry filters for control of particulate matter from the coating booths and observation of overspray emissions were already addressed in the Addendum to the Technical Support Document. The summary of the new comments is as follows:

Comments:

Please delete Conditions D.2.6 (Baghouse Inspections) and D.2.8 (Record Keeping Requirements) in their entirety. The baghouse inspection requirement is burdensome and redundant. Compliance with Condition D.2.5 (Visible Emissions Notations) assures compliance with Condition D.2.1 (Particulate Matter) and 326 IAC 6-3-2. To inspect the baghouse, woodworking shop operations must cease. This imposes a financial and operation burden upon Superior Wood Products with no redeeming environmental benefit. Likewise, record keeping requirements for the baghouse inspections are redundant and burdensome.

Response:

Visible emissions notations alert the source to the failure of one or more sections of the baghouse. Baghouse inspections and parametric monitoring can detect developing problems in the baghouse before such control failure occurs. Superior Wood Products chose to do baghouse inspections rather than pressure drop readings for compliance monitoring of the woodworking particulate control. Visible emissions notations and quarterly baghouse inspections are not required when the woodworking control is exhausting back into the building, only when exhausting to the atmosphere. The record keeping is necessary to document compliance with the condition.

No change to the permit was made in response to these comments.

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

**Company Name: Superior Wood Products
Address City IN Zip: 1058 West CR 400 North, Warsaw, Indiana 46580
Permit No/Plt ID: T085-7425-00072
Reviewer: Vickie Cordell
Date: October 3, 1997**

Booth ID	Material	Density (Lb/Gal)*	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
EU-01	Enamel	9.50	51.60%	0.00%	51.60%	0.00%	32.50%	0.065	3.23	4.90	4.90	1.03	24.70	4.51	0.85	15.08	80%
	Primer	8.90	62.15%	0.00%	62.15%	0.00%	22.80%	0.065	3.23	5.53	5.53	1.16	27.87	5.09	0.62	24.26	80%
	Stain	13.32	23.30%	2.90%	20.40%	4.60%	54.70%	0.065	3.23	2.85	2.72	0.57	13.69	2.50	1.88	4.97	80%
	Catalyst	9.10	39.00%	0.00%	39.00%	0.00%	0.00%	0.065	3.23	3.55	3.55	0.75	17.88	3.26	1.02	n/a	80%
	Clean-up Solvent	6.86	100.00%	0.00%	100.00%	0.00%	0.00%	0.024	3.23	6.86	6.86	0.53	12.76	2.33	0.00	n/a	100%

State Potential Emissions

4.04 96.91 17.69 4.37

EU-02	Enamel	9.50	51.60%	0.00%	51.60%	0.00%	32.50%	0.065	3.23	4.90	4.90	1.03	24.70	4.51	0.85	15.08	80%
	Primer	8.90	62.15%	0.00%	62.15%	0.00%	22.80%	0.065	3.23	5.53	5.53	1.16	27.87	5.09	0.62	24.26	80%
	Stain	13.32	23.30%	2.90%	20.40%	4.60%	54.70%	0.065	3.23	2.85	2.72	0.57	13.69	2.50	1.88	4.97	80%
	Catalyst	9.10	39.00%	0.00%	39.00%	0.00%	0.00%	0.065	3.23	3.55	3.55	0.75	17.88	3.26	1.02	n/a	80%
	Clean-up Solvent	6.86	100.00%	0.00%	100.00%	0.00%	0.00%	0.024	3.23	6.86	6.86	0.53	12.76	2.33	0.00	n/a	100%

State Potential Emissions

4.04 96.91 17.69 4.37

EU-03	Rosey Oak	7.30	98.20%	0.00%	98.20%	0.00%	1.00%	0.200	3.23	7.17	7.17	4.63	111.14	20.28	0.07	716.86	80%
	TopCoat	7.90	62.60%	10.20%	52.40%	9.67%	35.20%	0.200	3.23	4.58	4.14	2.67	64.18	11.71	1.67	11.76	80%
	Clean-up Solvent	6.86	100.00%	0.00%	100.00%	0.00%	0.00%	0.024	3.23	6.86	6.86	0.53	12.76	2.33	0.00	n/a	100%

State Potential Emissions

7.84 188.09 34.33 1.75

TOTAL State Potential Emissions for Surface Coating

(Sum of coatings applied and all solvent use.)

15.91 381.90 69.70 10.48

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

HAP Emission Calculations

Company Name: Superior Wood Products
Plant Location: 1058 West CR 400 North, Warsaw, Indiana 46580
County: Kosciusko
Permit No. / Pit ID: T085-7425-00072
Permit Reviewer: V. Cordell
Date: October 22, 1997

Emission Units EU-1 and EU-2:

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % M. Isobutyl ketone	Weight % Glycol Ethers	Weight % Xylene	Weight % Formaldehyde	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	M. Isobutyl ketone Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Total State Potential Emissions from Individ. Facility (ton/yr)
Enamel	9.50	0.06500	6.460					32.40%	0.37%	0.00	0.00	0.00	0.00	5.66	0.06	5.66
Primer	8.90	0.06500	6.460	13.55%		12.40%		14.79%	0.16%	2.22	0.00	2.03	0.00	2.42	0.03	6.67
Stain*	8.10	0.06500	6.460					1.00%		0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalyst	9.10	0.06500	6.460		18.00%					0.00	3.01	0.00	0.00	0.00	0.00	3.01
Clean-up Solvent	6.86	0.02400	6.460	22.00%		12.00%	1.00%	21.00%		1.02	0.00	0.56	0.05	0.98	0.00	2.61

Total State Potential Emissions for EU-1 and EU-2:	3.24	3.01	2.59	0.05	9.06	0.09	18.04
							Facility Total HAPs

Emission Unit EU-3:

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % M. Isobutyl ketone	Weight % Glycol Ethers	Weight % Xylene	Weight % Formaldehyde	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	M. Isobutyl ketone Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Total State Potential Emissions from Individ. Facility (ton/yr)
Rosey Oak	7.30	0.20000	3.230					96.75%		0.00	0.00	0.00	0.00	19.98	0.00	19.98
TopCoat	7.90	0.20000	3.230					16.61%	0.15%	0.00	0.00	0.00	0.00	3.71	0.03	3.71
Clean-up Solvent	6.86	0.02400	3.230	22.00%		12.00%	1.00%	21.00%		0.51	0.00	0.28	0.02	0.49	0.00	1.30

Total State Potential Emissions for EU-3:	0.51	0.00	0.28	0.02	24.19	0.03	25.03
							Facility Total HAPs

Total Potential Emissions for Source, by Individual HAP:	3.76	3.01	2.87	0.07	33.25	0.12	43.08
							Total Source HAPs

METHODOLOGY

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

* Used maximum HAP stain, which is different formula than the maximum VOC stain used in calculating potential VOC emissions.

Appendix A: Emissions Calculations
Particulate Matter (PM) and PM-10 Emissions
From Woodworking Operations

Company Name: Superior Wood Products
Address City IN Zip: 1058 West CR 400 North, Warsaw, Indiana 46580
Permit No/Plt ID: T085-7425-00072
Reviewer: Vickie Cordell
Date: May 22, 1998

FROM TITLE V APPLICATION, FORM PI-20:

Potential to Emit:

	<u>Maximum rate (units/hr)</u>	<u>Emission Factor (lb/units)</u>	<u>Emission Rate (lb/hr)</u>	<u>Maximum Uncontrolled Emiss.(tons/yr)</u>	<u>Control Efficiency (%)</u>	<u>Max Controlled Emissions tons/yr</u>
PM	3.23	28.44	91.86	402.35	(95)(99)	*0.20
PM10	3.23	0.34	1.1	4.82	99	0.05

Source of Emission Factors: Amount of material collected and efficiency.

Potential PM emissions:

59,670 lb of sawdust collected from cyclone #1 with a 95% efficiency
59,670 lb of sawdust collected from cyclone #2 with a 95% efficiency
18,360 lb of sawdust collected from cyclone #3 with a 95% efficiency
1,745 lb of sawdust collected from internal baghouses with a 99.9% efficiency

PM before controls:	$59,670 / 0.95 = 62,810$ lbs	
	$59,670 / 0.95 = 62,810$ lbs	
	$18,360 / 0.95 = 19,326$ lbs	
	$1,745 / 0.99 = \underline{1,763}$ lbs	
	146,709 lbs	
		$146,709 / 5,158 \text{ pcs} = 28.44 \text{ lbs PM/pc}$
		$1,745 / 5,158 \text{ pcs} = .338 \text{ lb PM10/pc}$

* The third cyclone does not return to a baghouse so maximum controlled emissions would be
 $19326 - 18360 = 966 \text{ lbs} \times \text{ton}/2000 \text{ lbs} = 0.483 \text{ tons}$

Per 326 IAC 6-3, Superior Wood is limited to:

Process Weight Rate = 1000 lb/hr; therefore,

$$2.58 \text{ lb/hr} \times 8760 \text{ hr/yr} \times \text{ton}/2000 \text{ lb} = 11.3 \text{ tons/yr}$$