

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Mobel, Inc.
2130 Industrial Park Road
Ferdinand, Indiana 47532**

(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.: T-037-7536-00081	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary household wood furniture manufacturing plant.

Responsible Official: **Mr. Paul Ruhe**
Source Address: **2130 Industrial Park Road, Ferdinand, IN 47532**
Mailing Address: **2130 Industrial Park Road, Ferdinand, IN 47532**
SIC Code: **2511**
County Location: **Dubois**
County Status: Attainment for all other criteria pollutants
Source Status: 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) Surface coating operations with a maximum rating of 50 units per hour, consisting of the following:
 - (1) Four (4) air atomization spray booths, identified as SCB-1 through SCB-4. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-1, S-2, S-3, and S-4.
 - (2) Three (3) air assisted airless spray booths, identified as SCB-5 through SCB-7. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-5, S-6A, S-6B, S-7A, and S-7B.
 - (3) One (1) air assisted airless touch-up spray booth, identified as TU-1. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-8A and S-8B.
 - (4) One (1) rollcoater, identified as RC-1. Emissions shall be exhausted at Stack/Vent ID #S-8A and S-8B.
 - (5) One (1) drawer dip coater, identified as DC-1. Emissions are not directed to a specific exhaust point.
- (b) Woodworking operations WW, consisting of the following:
 - (1) Woodworking equipment with emissions controlled by a Northfab baghouse, identified as WW-1, with a maximum rating of 1870 pounds per hour. Emissions shall be controlled by baghouse dust collector, then exhausted at Stack/Vent ID #B-1.
 - (2) Woodworking equipment with emissions controlled by a Carter Day baghouse, identified as WW-2, with a maximum rating of 1870 pounds per hour. Emissions shall be controlled by baghouse dust collector, then exhausted at Stack/Vent ID #B-2.

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

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

- (a) Natural gas-fired combustion unit(s) with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (b) One (1) natural gas fired boiler with #2 fuel oil back up, identified as B1, with a maximum rating of 0.14 MMBtu per hour. Emissions shall be exhausted at Stack/Vent ID #BS-1.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

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

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

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

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

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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

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

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

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

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

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

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

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

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

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

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

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

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

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

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

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

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

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

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

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

B.23 Construction Permit Requirement [326 IAC 2]

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

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

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

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

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit of VOC are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee:

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

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

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

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

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

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

C.13 Monitoring Methods [326 IAC 3]

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

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

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

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

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

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

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

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

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

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

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

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

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

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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

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

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

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

- (d) Unless otherwise specified in this permit, any quarterly 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.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS - Surface coating operations

Facility Description [326 IAC 2-7-5(15)]: Surface coating operations with a maximum rating of 50 units per hour, consisting of the following:

- (1) Four (4) air atomization spray booths, identified as SCB-1 through SCB-4. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-1, S-2, S-3, and S-4.
- (2) Three (3) air assisted airless spray booths, identified as SCB-5 through SCB-7. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-5, S-6A, S-6B, S-7A, and S-7B.
- (3) One (1) air assisted airless touch-up spray booth, identified as TU-1. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-8A and S-8B.
- (4) One (1) rollcoater, identified as RC-1. Emissions shall be exhausted at Stack/Vent ID #S-8A and 8B.
- (5) One (1) drawer dip coater, identified as DC-1. Emissions are not directed to a specific exhaust point.

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

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

The VOC input usage from the surface coating operations shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

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

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from the surface coating operations shall not exceed the allowable 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 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to Construction Permit #037-3501-00081, issued on November 18, 1994, and 326 IAC 8-1-6, the BACT for the dip coater (DC-1), shall be deemed satisfied provided that the dip coater complies with one of the following surface coating application methods:

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

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

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to Construction Permit #037-3501-00081, issued on November 18, 1994, and 326 IAC 8-2-12 for the rollcoater (RC-1), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent 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 one and eight tenths (1.8) pound 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.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.7 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.1.8 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) 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 limits specified in Condition D.1.1, D.1.2, and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the surface coating booths, identified as SCB-1 through SCB-7, and the touch-up booth, identified as TU-1, are in operation.

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, S-3, S-4, S-5, S-6A, S-6B, S-7A, S-7B, S-8A, S-8B, and S-9) 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)]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, 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.1.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

- (d) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) An Initial Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of December 7, 1998. The initial compliance report must include data from the entire month that the compliance date falls.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

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

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

and

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

SECTION D.2 FACILITY OPERATION CONDITIONS - Woodworking Operations

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

- (1) Woodworking equipment with emissions controlled by a Northfab baghouse, identified as WW-1, with a maximum rating of 1870 pounds per hour. Emissions shall be controlled by a baghouse dust collector, then exhausted at Stack/Vent ID #B-1.
- (2) Woodworking equipment with emissions controlled by a Carter Day baghouse, identified as WW-2, with a maximum rating of 1870 pounds per hour. Emissions shall be controlled by a baghouse dust collector, then exhausted at Stack/Vent ID #B-2.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from the woodworking operations shall not exceed the allowable 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:

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

Based on a process weight rate of 1,870 pounds per hour, the PM emissions from each baghouse shall not exceed 3.92 pounds per hour.

D.2.2 Opacity

Pursuant to CP 037-3501-00081, issued on November 18, 1994, in lieu of a stack test, the PM emissions from the woodworking processes shall be in compliance with 326 IAC 6-3 provided that visible emissions from the baghouses are limited to 10% opacity.

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

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

Compliance Determination Requirements

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

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.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.

D.2.5 Particulate Matter (PM)

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

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

D.2.6 Visible Emissions Notations

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

D.2.7 Baghouse Inspections

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

D.2.8 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.2.9 Record Keeping Requirements

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

SECTION D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities

Facility Description [326 IAC 2-7-5(15)]: One (1) natural gas fired boiler with #2 fuel oil back up, identified as B1, with a maximum rating of 0.14 MMBtu per hour. Emissions shall be exhausted at Stack/Vent ID #BS-1.

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

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

Pursuant to 326 IAC 6-2-3 (e) (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 0.14 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

Compliance Determination Requirements

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

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

**PART 70 OPERATING PERMIT
CERTIFICATION FORM**

Source Name: **Mobel, Inc.**
Source Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
Mailing Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
Part 70 Permit No.: **T-037-7536-00081**

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: **Mobel, Inc.**
Source Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
Mailing Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
Part 70 Permit No.: **T-037-7536-00081**

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 FORM**

For HAPs usage - Wood Furniture NESHAP

Source Name: **Mobel, Inc.**
 Source Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
 Mailing Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
 Part 70 Permit No.: **T-037-7536-00081**
 Facility: Surface Coating Operations
 Parameter: HAPs - NESHAP
 Limit: Finishing operations - 1.0 lb VHAP/lb Solids
 Foam adhesives (meeting upholstered flammability requirements)-1.8 lb VHAP/lb Solids
 All other contact adhesives - 1.0 lb VHAP/lb Solids
 Thinners (on-site formulation) - 3% VHAP content by weight
 All other thinner mixtures - 10% VHAP content by weight
 Strippable spray booth coating - 0.8 lb VOC/lb solids

YEAR: _____

Month	Finishing Operations (1 lb VHAP/lb Solid)	Thinners (on site formulation) (3% by weight)	All other Thinner mixtures (10% by weight)	Foam adhesives (upholstered) (1.8 lb VHAP/lb solid)	Contact Adhesives (1.0 lb VHAP/lb solid)	Spray Booth coating (0.8 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 REPORT FORM**

Source Name: **Mobel, Inc.**
Source Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
Mailing Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
Part 70 Permit No.: **T-037-7536-00081**
Facility: **Surface Coating Operations**
Parameter: **VOC usage**
Limit: **less than 250 tons per twelve (12) consecutive month period**

YEAR: _____

Month	VOC usage this month (tons per month)	VOC usage for previous 12 consecutive months (tons per previous 12 month period)
Month 1		
Month 2		
Month 3		

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

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

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

Source Name: **Mobel, Inc.**
 Source Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
 Mailing Address: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
 Part 70 Permit No.: **T-037-7536-00081**

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the 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:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: Mobel, Inc.
Source Location: 2130 Industrial Park Road, Ferdinand, IN 47532
County: Dubois
SIC Code: 2511
Operation Permit No.: T-037-7536-00081
Permit Reviewer: Melissa Groch

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

Permitted Emission Units and Pollution Control Equipment

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

- (a) Surface coating operations with a maximum rating of 50 units per hour, consisting of the following:

Four (4) air atomization spray booths, identified as SCB-1 through SCB-4. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-1, S-2, S-3, and S-4.

Three (3) air assisted airless spray booths, identified as SCB-5 through SCB-7. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-5, S-6A, S-6B, S-7A, and S-7B.

One (1) air assisted airless touch-up spray booth, identified as TU-1. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S-8A and S-8B.

One (1) drawer dip coater, identified as DC-1. Emissions shall be exhausted at Stack/Vent ID #S-9.

One (1) rollcoater, identified as RC-1. Emissions are fugitive.

- (b) Woodworking operations WW, consisting of the following:

Woodworking equipment with emissions controlled by a Northfab baghouse, identified as WW-1, with a maximum rating of 1870 pounds per hour. Emissions shall be controlled by baghouse dust collector, then exhausted at Stack/Vent ID #B-1.

Woodworking equipment with emissions controlled by a Carter Day baghouse, identified as WW-2, with a maximum rating of 1870 pounds per hour. Emissions shall be controlled by baghouse dust collector, then exhausted at Stack/Vent ID #B-2.

Unpermitted Emission Units and Pollution Control Equipment

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

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

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

Insignificant Activities

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

- (a) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (d) Equipment used exclusively for packaging lubricants and greases.
- (e) Fuel oil-fired combustion unit(s) with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (f) Natural gas-fired combustion unit(s) with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (1) One (1) natural gas fired boiler with #2 fuel oil back up, identified as B1, with a maximum rating of 0.14 MMBtu per hour. Emissions shall be exhausted at Stack/Vent ID #BS-1.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (k) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

Existing Approvals

The source has been operating under the following approval:

- (a) CP 037-3501-00081, issued on November 18, 1994.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 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	greater than 100
SO ₂	less than 100
VOC	greater 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)
Ethyl Benzene	less than 10
Glycol Ether	greater than 10
MEK	greater than 10
Methanol	greater than 10
MIBK	greater than 10
Trimethyl Benzene	less than 10
Toluene	greater than 10
Xylene	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP 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.
- (c) This source, otherwise required to obtain a Prevention of Significant Deterioration (PSD) permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the PSD emission levels. Therefore, this source will be issued a Part 70 Operating Permit, pursuant to 326 IAC 2-7, and is not subject to 326 IAC 2-2.
- (d) 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 reflects 1996 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.248
PM-10	0.112
SO ₂	0.004
VOC	175.037
CO	0.245
HAP (Individual)	16.01
HAP (Combination)	52.81
NO _x	0.7

Limited Potential to Emit

- (a) The source has accepted a federally enforceable limit of 249 tons per year for VOC emissions.
- (b) The table below summarizes the total limited potential to emit of the significant emission units.

Process/ facility	Limited Potential to Emit (tons/year)			
	PM	PM-10	VOC	HAPs
Surface Coating Booths	$E = 4.10P^{0.67}$	---	249	---
Woodworking	$E = 4.10P^{0.67}$	---	---	---
Total Emissions	---	--	249	---

Attached Tables (A) to (E) summarize the permit conditions and requirements.

County Attainment Status

The source is located in Dubois 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. Dubois County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

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

The wood furniture coating operations are 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 November 21, 1997.

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

- (a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent 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
 - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (4) Use a combination of (1), (2), and (3).
- (b) Limit VHAP emissions contact adhesives as follows:
 - (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.
 - (2) 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.
 - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (d) 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 operation.
- (e) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating operations.

- (f) A copy of this rule is enclosed.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The total source potential to emit VOC is limited to 249 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 4-1-2 (Open Burning)

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

326 IAC 5-1 (Visible Emissions Limitations)

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

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

326 IAC 6-4 (Fugitive Emissions)

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

State Rule Applicability - Surface Coating Booths with dry filter control

326 IAC 2-2 (Prevention of Significant Deterioration)

The surface coating operations shall use no more than 20.7 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC to less than 249 tons per 365 consecutive day period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from the gluing operations shall not exceed the allowable 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:

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

326 IAC 8 (Surface Coating)

The coating booths SCB-1 through SCB-7 are not subject to 326 IAC 8-1-6, 326 IAC 8-2-12, or 326 IAC 8-6-1(2) as the following are true:

- (a) This source is located in Dubois County,

- (b) These facilities were constructed in 1971, and

326 IAC 8 (Surface Coating)

The touch-up booth TU-1 is not subject to either 326 IAC 8-1-6, 326 IAC 8-2-12, or 326 IAC 8-6-1 since the following are true:

- (a) This source is located in Dubois County,
(b) This facility was constructed in 1986, and
(c) Potential VOC emissions from this facility do not exceed 25 tons per year.

State Rule Applicability - Surface Coating Booths without controls

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the PM emissions from each of the surface coating operations shall not exceed the allowable 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:

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

326 IAC 8-1-6 (Best Available Control Technology (BACT))

Pursuant to Construction Permit #037-3501-00081, issued on November 18, 1994, and 326 IAC 8-1-6, the BACT for the dip coater DC-1, shall consist of compliance with the emission limits under 326 IAC 8-2-12 which would be applicable to a comparable new facility.

326 IAC 8-2-12 (Surface Coating)

Pursuant to Construction Permit #037-3501-00081, issued on November 18, 1994, and 326 IAC 8-1-6, the surface coatings applied to wood furnishings by the dip coater DC-1 and roll coater RC-1 shall utilize only the following application methods:

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

High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

State Rule Applicability - Woodworking Operations WW

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the PM emissions from the woodworking process shall not exceed the allowable 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

Based on a process weight rate of 1,870 pounds per hour, the PM emissions from each baghouse shall not exceed 3.92 pounds per hour.

State Rule Applicability - One (1) natural gas fired boiler with #2 fuel oil back up (B1)

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

Pursuant to 326 IAC 6-2-3(e), the PM emissions from the 0.14 mmBtu per hour boiler shall not exceed 0.6 pounds per million Btu.

Since the potential emission rate for the 0.14 mmBtu per hour boiler of 0.002 pounds per hour when burning natural gas is less than the allowable emission rate of 0.084 pounds per hour, then this boiler is in compliance with 326 IAC 6-2-3. See the spreadsheet in Appendix A for boiler B1.

Since the potential emission rate for the 0.14 mmBtu per hour boiler of 0.002 pounds per hour when burning fuel oil is less than the allowable emission rate of 0.084 pounds per hour, then this boiler is in compliance with 326 IAC 6-2-3. See the spreadsheet in Appendix A for boiler B-1.

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 condition 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:

The surface coating operations with dry filter controls (SCB-1 through SCB-7, and TU-1) have applicable compliance monitoring conditions as specified below:

- (a) The dry filters for PM control shall be in operation at all times when the surface coating booths, identified as SCB-1 through SCB-7, and the touch-up booth, identified as TU-1, are in operation.
- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry 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.

- (c) 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.

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

The woodworking operations have applicable compliance monitoring conditions as specified below:

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

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

Air Toxic Emissions

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

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

Conclusion

The operation of this household wood furniture manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Mobel, Inc.
Source Location: 2130 Industrial Park Road, Ferdinand, IN 47532
County: Dubois County
SIC Code: 2511
Operation Permit No.: T037-7536-00081
Permit Reviewer: Melissa Groch

On December 9, 1997, the Office of Air Management (OAM) had a notice published in The Herald, Jasper, Indiana, stating that Mobel, Incorporated had applied for a Part 70 Operating Permit to operate a stationary household wood furniture manufacturing plant. 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 January 5, 1998, Paul Ruhe, Assistant Manager, of Mobel, Inc. submitted the following comments (changes are **bolded** for emphasis, and previous language changed or deleted has a ~~strikeout line~~ through it):

Comment 1:

Regarding permit fees, a billing for permit fees associated with the applicability of the 40 CFR 63 Subpart JJ was included with the Public Notice package. It is Mobel, Inc.'s, understanding that fees for assessments related to such standards are included with Construction Permit fees, but all costs associated with the issuance of the Title V permit should have been covered by the Title V fees Mobel has paid over the last several years. Mobel does not believe that this fee is owed under the state's current rules. Please advise Mobel if you disagree with this position.

Response to Comment 1:

The IDEM agrees.

Comment 2:

The indication that "Emissions are fugitive", in section A.2, at the end of the description of the rollcoater, RC-1, should be moved to the end of the description of the drawer dip coater, DC-1.

Also, a comment from Jarod Klaas of Keramida Environmental, Inc., was submitted on February 19, 1998, regarding the above comment from Mobel, Inc., and a written statement on how it should read. The comment is as follows:

Section A.2(a) of the draft Title V permit for Mobel lists the rollcoater and drawer dip coater incorrectly.

Response to Comment 2:

On Form GSD-06, of the Part 70 permit application for Mobel, Inc., the drawer dip coater was listed as venting through stack S-9. Also listed is the rollcoater, as not having a stack.

Per a telephone conversation with Paul Ruhe, of Mobel, Inc., on February 10, 1998, he agreed that the stack listed for the dip coater was incorrect in the application. He stated that Keramida would assist in correcting this problem.

After this discussion, changes have been made to the proposed permit to reflect the revision preferred by Keramida Environmental, Inc., the consultant for Mobel, Inc. Also, the term "fugitive" was deleted. This will avoid any confusion with the use of the term "fugitive emissions" with regard to major source applicability. Therefore, in condition A.2 (a), the last two unit descriptions are changed to read:

One (1) ~~drawer dip coater, identified as DC-1~~ **rollcoater, identified as RC-1**. Emissions shall be exhausted at Stack/Vent ID #~~S-9~~ **#S-8A and S-8B**.

One (1) ~~rollcoater, identified as RC-1~~ **drawer dip coater, identified as DC-1**. Emissions are ~~fugitive~~ **not directed to a specific exhaust point**.

Also changed are the last two descriptions listed in the facility description box for section D.1.

Since the OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the section Permitted Emission Units and Pollution Control Equipment.

Comment 3:

In the proposed permit, under section A.3, the 0.14 mmBtu per hour boiler with #2 fuel oil as back-up is included as a "specifically regulated" insignificant activity. Mobel, Inc. would like to request that this designation be removed from this section, and furthermore, that section D.3 be removed also.

Response to Comment 3:

The IDEM cannot remove these sections from the final permit because this boiler is subject to 326 IAC 6-2-3 (e) as it was constructed in 1975.

Comment 4:

Mobel, Inc., does not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by permit condition C.16. Mobel, Inc., would request that all references to a Compliance Response Plan be eliminated from this condition.

Response to Comment 4:

There is sufficient authority for requiring a Compliance Response Plan as part of a Compliance Monitoring Plan. 326 IAC 2-7-5(1) requires that all Title V permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance, even where the applicable requirement does not require periodic testing or instrumental monitoring.

Furthermore, the Compliance Response Plan (CRP) is part of the overall Compliance Monitoring Plan (CMP). The CMP calls for two types of maintenance: preventive maintenance and corrective maintenance. The OAM received many comments from the regulated community regarding the previous version of the CMP, which included preventive and corrective maintenance in the same document, the Preventive Maintenance Plan (PMP). These comments requested that the OAM split the PMP into two plans: one for preventive maintenance and one for corrective maintenance. Therefore, the OAM responded by splitting the preventive maintenance and the corrective maintenance into the PMP and CRP, respectively. The requirement that the permit contain operational requirements and limitations that assure compliance with all applicable requirements, coupled with the rule requirements for compliance monitoring, provides all the necessary authority for this permit requirement. Therefore, the IDEM disagrees with your position that the CRP be eliminated from the above mentioned condition, C.16, which is now listed as C.17.

Comment 5:

Mobel, Inc., requested in the permit application that a facility wide limit of 249 tons per year be included in the Title V permit, and this request is reflected in permit condition C.1. However, Condition D.1.1 contains a limit of 20.7 tons per month. Mobel would like to request that the limit be expressed as 249 tons per 365 day period instead of a monthly limit.

In addition, on March 23, 1998, the following comment from Paul Ruhe, of Mobel, Inc., was received:

In regards to VOC monitoring, if we can do monthly monitoring and yet only have to worry about the 249 ton maximum per year with no maximum per month, we'll monitor on a monthly basis.

Response to Comment 5:

Condition D.1.1, PSD Minor Limit, has been modified due to these requests by Mobel, Inc., and with minor language changes by the IDEM, is changed to read:

~~The surface coating operations shall use no more than 20.7 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month~~ **The surface coating operations shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period.** This usage limit is required to limit the potential to emit of VOC to less than **250** tons per ~~365~~ **twelve (12)** consecutive ~~day~~ **month** period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Also with regards to this limit, Condition C.1, PSD Minor Source Status, has the following changes:

The total source potential to emit ~~of~~ VOC is limited to ~~less than 249~~ **250** tons per ~~twelve (12) consecutive month period~~ **year**. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

Since the OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the section regarding State Rule Applicability for the surface coating operations.

Comment 6:

Condition D.1.5 indicates that the compliance deadline for 40 CFR 63, Subpart JJ is November 21, 1997. We believe that the correct compliance deadline is December 7, 1998 since our actual emissions of HAPs is less than 50 tons per year. We would request that the correct compliance date be included in the final permit.

Response to Comment 6:

According to the facsimile on February 2, 1998, from Keramida Environmental, regarding Mobel, Inc. 1996 emissions, the OAM will change this compliance date to December 7, 1998. The affected language regarding this change is listed below.

In condition D.1.5, Wood Furniture NESHAP [40 CFR 63, Subpart JJ], part (a) is now written as follows:

- (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 ~~November 21, 1997~~ **December 7, 1998**.

Also, condition D.1.14, Reporting Requirements, the dates in part (b) and (c) have been changed, and a part (d) has been added as follows:

- (b) An Initial Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of ~~November 21, 1997~~ **December 7, 1998**. The initial compliance report must include data from the entire month that the compliance date falls.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

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

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

and

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

The OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD.

Comment 7:

Condition D.1.9 refers to "Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2, D.1.5..." We would request that Condition D.1.2 and D.1.5 be deleted since these conditions refer to Particulate Matter and Volatile Hazardous Air Pollutant limitations.

Response to Comment 7:

Regarding condition D.1.9, the IDEM cannot remove the reference to condition D.1.5 because the NESHAP has a VOC limit in addition to the VHAP limits. The IDEM can remove the reference to condition D.1.2 only because it is regarding a PM limit and not a specific VOC limit. This condition, D.1.9, Volatile Organic Compounds (VOC), is now written as follows, including a revision of the listed rule cites:

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, ~~D.1.2~~, and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3)~~(A)~~ and 326 IAC 8-1-2(a)~~(7)~~ using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment 8:

The conditions D.1.12, D.1.13(d), D.2.6, D.2.7, D.2.8, and D.2.9(a), require that Mobel, Inc., perform daily or weekly inspections of the dry filters, baghouses, roofs, and dust bins. As indicated in our Compliance Monitoring Plan, which we submitted with our application, all of the emission units covered by the permit have allowable emissions less than 10 pounds per hour of particulate matter. It is our understanding that compliance monitoring plans were not required for smaller emission units (below 10 lbs/hour allowable emissions), and that compliance monitoring conditions would not be included in the Title V permits. We request that these conditions (and the associated record keeping requirements in D.1.13(d) and D.2.9(a) be eliminated from the permit. While we do plan to monitor the operation of our control devices, we do not believe that the cost associated with the level of monitoring and record keeping required by these conditions is warranted for smaller emission units, or it is supported by guidance from IDEM. If condition D.2.7 is retained in the final permit we would also request that it indicate that monitoring is only required when the baghouses discharge to atmosphere. During winter months, the baghouse exhaust is returned inside our building to conserve energy.

Response to Comment 8:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- 1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
- 2) Implement the preventive maintenance plan; and,
- 3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only if:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary, it does state that a compliance monitoring plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. However, there are some types of operations that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance.

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility.

Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. In addition, evidence of deposition on the rooftops or the ground strongly implies increased particulate matter emissions into the air.

As discussed below in the Response to Comment 9, the OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly.

As a result of the discussions above, these conditions will not be removed. Since Condition D.2.7, Baghouse Inspections, will remain in the final permit, the following language has been added at the request of Mobel, Inc.:

An inspection shall be performed each calendar quarter of all bags controlling the emissions from the woodworking operations **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.

Comment 9:

While we believe that Condition D.1.12(b) should be eliminated from this permit for reasons stated in Comment 8, we also believe that Condition D.1.12(b) establishes a vague standard in that it requires corrective actions for "evidence of overspray". This could conceivably require corrective actions due to relatively minor amounts of solids on the roof or other nearby surfaces, which would in no way represent a violation of the underlying applicable requirement. For this reason we would request that, if Condition D.1.12 remains in the final permit, the second sentence of paragraph (b) be eliminated.

Response to Comment 9:

The IDEM cannot remove part (b) from condition D.1.12. The recording by the said company of any evidence of overspray from their stacks is meant to alert the source to possible problems with the control of their emissions. This does not mean that a violation has in fact occurred, but simply that the problem should be investigated further. Also, as stated in the last sentence of part (b), it is the failure to take response steps that can incur a violation. The IDEM, however, has revised this condition for other reasons. The filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in our compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed; however, this can be done less frequently. Therefore, less stringent requirements, weekly rather than daily visible observations, and monthly rather than weekly rooftop over spray checks, are changed as shown below, including additional clarification in the second sentence of part (a). These parts now read as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the surface coating booth stacks (S-1, S-2, S-3, S-4, S-5, S-6A, S-6B, S-7A, S-7B, S-8A, S-8B, and S-9)** 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 **a noticeable change in an 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.

Also, because of the monitoring frequency change, D.1.13, Record Keeping Requirements, part (d) is changed to read:

To document compliance with Condition D.1.12, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

The OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under Compliance Requirements for the surface coating operations.

Comment 10:

Condition D.1.13(b)(5), Record keeping, requires that we maintain records of monthly average HAP contents of our surface coating data. This information is only relevant if we use monthly averages to demonstrate compliance. If we chose to demonstrate compliance by using all compliant coatings, we are not obligated under Subpart JJ to calculate monthly averages. We would suggest that this condition be amended by adding the phrase "if compliance is demonstrated based on monthly averages" to the end of the condition.

Response to Comment 10:

The IDEM agrees. Condition D.1.13(b)(5), under Record Keeping Requirements, has been changed to:

- (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.

Comment 11:

Condition D.2.2, Opacity, reads "The PM emissions from the woodworking processes shall be in compliance with 326 IAC 6-3 provided that visible emissions from the baghouses are limited to 10 % opacity." We do not believe that this requirement is supported by an applicable regulatory requirement. 326 IAC 5 establishes a 40% opacity limit, and 326 IAC 6-3 establishes a pound per hour limit, for which there is no valid correlation between opacity and the mass emission rate. We would request that this condition be eliminated from the permit.

Response to Comment 11:

The 10% opacity limit was initially written in Construction Permit #037-3501-00081, under Operation Condition 7(b). The Title V permit is not being more stringent by adhering to this limit. Therefore, the 10% opacity limit should not be removed from the permit. Also, pursuant to 326 IAC 2-1-3(i)(8), the commissioner may impose such conditions in the permit as necessary to ensure that the source or facility will comply with all applicable rules; and that the ambient air quality standards established in 326 IAC 1-3, the prevention of significant deterioration standards established in 326 IAC 2-2, and the offset requirements established in 326 IAC 2-3, will be attained and maintained so that the public health may be protected.

With regards to this comment, the IDEM recognizes that for condition D.2.2, Opacity, the original basis for including this opacity limit was not clarified. This condition is changed to:

Pursuant to CP 037-3501-00081, issued on November 18, 1994, in lieu of a stack test, the PM emissions from the woodworking processes shall be in compliance with 326 IAC 6-3 provided that visible emissions from the baghouses are limited to 10% opacity.

Comment 12:

While Mobel, Inc., believes that Condition D.2.8(a), Compliance Monitoring Requirements, should be eliminated from the permit for the reasons stated above in Comment 10, we have specific concerns with the requirement to shutdown the failed compartments until they have been replaced or repaired. First, our dust collectors do not allow us to isolate a single compartment, and therefore this condition would necessitate the shutdown of the entire unit and the associated production equipment. Secondly, we believe that paragraph (b) of this condition is adequate to provide for the evaluation of the problem and the development of a corrective action plan, without requiring the shutdown of the unit. Thirdly, the condition does not cite the specific regulatory authority to require the shutdown of the malfunctioning compartment, and we are unaware that such specific authority exists in current state rules. Lastly, this condition is potentially in conflict with Condition B.13 which establishes specific procedures for “emergency “ situations. For all of these reasons, we would request that, if Condition D.2.8 remains in the final permit, paragraph (a) be eliminated.

Response to Comment 12:

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

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

Therefore, the OAM believes that the requirement to shutdown the affected compartments is a reasonable action to ensure compliance with the particulate matter limitations. Also, applicability of the emergency provisions of 326 IAC 2-7-16 will be determined on a fact specific basis if necessary. There is a standard condition that addresses what actions a permittee must take when bag failure is observed. A number of comments have been especially directed at the provision that applies to single compartment baghouses requiring that the baghouse and the process shut down. This condition is reformatted to lessen the confusion between multi- and single compartment baghouses. These changes are seen in item 41 of this document.

Comment 13:

Mobel, Inc., requests that Section D.3 be deleted because the natural gas fired boiler rated at 0.14 mmBtu per hour is an insignificant activity. This operation should be identified as such under the listing of insignificant activities in the Technical Support Document.

Response to Comment 13:

The IDEM agrees that the 0.14 mmBtu per hour boiler is insignificant, however, the IDEM cannot remove this section from the final permit because this boiler is subject to 326 IAC 6-2-3 (e) as it was constructed in 1975.

Comment 14:

Mobel, Inc., would request that the Natural Gas Fired Boiler Certification form be removed from the proposed permit since the boiler in this facility is rated under 10 mmBtu per hour and is considered an insignificant activity.

Response to Comment 14:

The IDEM agrees.

Comment 15:

In the Technical Support Document, under Existing Approvals, Mobel, Inc., requests that the Amendment to CP 037-3501, A 037-4811, issued on October 12, 1995 be listed as well.

Response to Comment 15:

Since the OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD.

Comment 16:

In the Technical Support Document, under Potential Emissions, Butanol should be removed from the HAPs table and HAPs calculations since butanol is not considered a HAP.

Response to Comment 16:

Since the OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD.

Comment 17:

In the Technical Support Document, under State Rule Applicability- One (1) natural gas fired boiler with #2 fuel oil back up (B1), Mobel, Inc., requests that this section be deleted because the natural gas fired boiler rated at 0.14 mmBtu per hour is an insignificant activity. This operation should be identified as such under the listing of insignificant activities in the TSD. Also, the last paragraph under this section is repeated.

Response to Comment 17:

See the response to comment 3 regarding the rule applicability for this boiler. Also, in the TSD, the last paragraph under State Rule Applicability for One (1) natural gas fired boiler with #2 fuel oil back up (B1) refers to the limit when this boiler is burning fuel oil, whereas the second to the last paragraph refers to the natural gas limit.

Upon further review, OAM has incorporated the following changes into the final Part 70 permit (changes are **bolded** for emphasis, and previous language changed or deleted has a ~~strikeout line~~ through it).

Because of descriptive and grammatical changes, the following corrections are made to the final Part 70 permit:

1. In Section A, the Source Summary has been changed to read:

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. In condition A.1, the source status was revised to read as follows:

Source Status: Minor Source, under PSD ~~or Emission Offset~~ Rules
 Major Source, Part 70 Permit Program

3. Condition A.5 has been deleted. Language has been added to B.14, Permit Shield, to address the effect of prior permit conditions. It previously read as follows:

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]
The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

The Table of Contents has also been changed to reflect this deletion.

4. Condition B.1(b), Permit No Defense, has been modified to read:

This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

5. In part (c) of Condition B.8, Duty to Supplement and Provide Information, several language changes have been made. It now reads as follows:

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 unfurnished 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, the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

6. B.11(a) and (c), under Annual Compliance Certification, have been modified to read:

(a) The Permittee shall annually ~~certify that the source had 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:

(c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was **based on** continuous or intermittent **data**;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~

- (5) **Any insignificant activity that has been added without a permit revision; and**
- (5) (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

7. Condition B.12(a), Preventive Maintenance Plan, has been changed to read as follows:

- (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**

8. All parts in Condition B.14, Permit Shield, have been changed to read as follows:

- (a) ~~Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided either of the following:~~
- ~~(1) The applicable requirements are included and specifically identified in this permit;~~
 - ~~(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.~~

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

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

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) ~~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):~~ 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 modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(e)(7)]~~ **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 minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]~~ **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)]**
9. In Condition B.16, Deviations from Permit Requirements and Conditions, parts (b) and (c) have been changed, and a part (d) has been added to read:
- (b) ~~Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.~~ **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) ~~Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~ **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.**

10. Condition B.18, Permit Renewal, has a rule cite added to part (a). This part now reads as:

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

11. Conditions B.19, Administrative Permit Amendment, B.20, Minor Permit Modification, and B.21, Significant Permit Modification, have all been combined into one condition numbered B.19, Permit Amendment or Modification, shown below. The previous Conditions, B.20 and B.21, have been deleted, and the remainder of Section B has been renumbered accordingly. The new B.19 condition reads 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)]**

Also, the Table of Contents has been changed accordingly.

12. Condition B.26, now B.24, Inspection and Entry, has a minor change in the first sentence. It reads as follows:

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:

Also, language has been added to part (e) of this condition which reads as follows:

- (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. In Condition B.25, previously B.27, Transfer of Ownership or Operation, part (b) has language added. It now reads as:

 - (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 B.26, Annual Fee Payment, is changed to read:

 - (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. A new condition, C.2, Particulate Matter Emission Limitations for Processes with Process Weight Rates Less than One Hundred pounds per hour, has been added to Section C. It reads as follows:

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- The remaining conditions in this section have been renumbered, and the Table of Contents reflects this change as well.
16. The last sentence of Condition C.2, Opacity, now C.3, has been deleted and the condition has been revised to reflect current rule language. It now reads as follows:

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~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **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 nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

~~This condition is not federally enforceable.~~

17. C.3, Open Burning, now C.4, has been modified to read:

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

18. C.4, Incineration, now C.5, the last sentence has been deleted which previously read as:

~~This condition is not federally enforceable.~~

19. The last sentence of C.5, Fugitive Dust Emissions, now C.6, has been modified to:

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

20. C.6, Operation of Control Equipment, now C.7, has been modified to read as follows:

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

21. Condition C.7, now C.8, Stack Height, has been changed to read:

(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.~~

22. The previous original language from Condition C.13, with the exception of the second sentence in part (d), has been listed in C.8, now C.9, Asbestos Abatement Projects, and reads as follows:

C.8 9 Asbestos Abatement Projects ~~Accreditation~~ [326 IAC 14-10] [326 IAC 18] [40 CFR 61 ~~, Subpart M. 140~~]

~~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.~~

- (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.

23. The first sentence in C.9(a), Performance Testing, now C.10, is changed to:

All testing shall be performed according to the provisions of 326 IAC 3-2-4 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM. Also changed is the rule cite in the Table of Contents for this condition, and the sentence below has been added to the end of part (a).

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.

And after part (b), the following sentence was added:

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

24. Condition C.10, now C.11, Compliance Schedule, has been revised to:

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.~~

25. Condition C.11, Compliance Monitoring, now listed as C.12, is changed to read:

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 shall notifies:**

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

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

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

26. Condition C.13 , Monitoring Methods, now reads as follows with the addition of one word:

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.

27. Condition C.15, Risk Management Plan, has a language change in the first sentence to read:

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

Also, a sentence has been added to the end of this condition. It reads as:

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

28. In condition C.16, Compliance Monitoring Plan- Failure to Take Response Steps, has two new rule cites added as follows:

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

Also, the Table of Contents has also been modified to reflect this change.

29. C.17, has two rule cites added to the first line. They are:

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

Also, the Table of Contents has been modified to reflect this rule cite addition, and the sentence below has been added to the end of this condition.

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. C.18, Emission Statement, part (a) has been modified to read:

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. This annual emission statement shall meet the following requirements:

31. In condition C.20, General Record Keeping Requirements, the rule cites have changed and part (a) has been modified to read:

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

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available ~~within one (1) hour upon verbal~~ **the 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 a 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.~~

The Table of Contents has also been modified to reflect this change.

32. C.21, General Reporting Requirements, has been revised to:

- (a) ~~Reports required by conditions in Section D of this permit shall be submitted to:~~

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

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

- (b) ~~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.~~

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 report shall be submitted within thirty (30) days of the end of the reporting period.~~ **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) ~~All instances of deviations 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.~~ **Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.**
- (e) ~~Any corrective actions or response steps taken as a result of each deviation~~ **All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports.
- (f) ~~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.~~ **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).

33. In the equipment description box under Facility Operation Conditions for Sections D.1, D.2, and D.3, the following phrase has been added:

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

34. Also in this section, condition D.1.3 has been changed to read as follows:

Pursuant to Construction Permit #037-3501-00081, issued on November 18, 1994, and 326 IAC 8-1-6, the BACT for the dip coater (DC-1), shall consist of compliance with the emission limits under 326 IAC 8-2-12 which would be applicable to a comparable new facility. **be deemed satisfied provided that the dip coater complies with one of the following surface coating application methods:**

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

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

Since the OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the section regarding State Rule Applicability for the surface coating operations.

35. The first sentence in condition D.1.4, Volatile Organic Compounds, has been corrected as it does not apply to the drawer dip coater. It will now read as follows:

Pursuant to Construction Permit #037-3501-00081, issued on November 18, 1994, and 326 IAC 8-2-12 for the drawer dip coater (DC-1) and the rollcoater (RC-1), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

36. Under the Wood Furniture NESHAP [40 CFR 63, Subpart JJ] in section D.1.5, the last sentence in (b)(1)(B) is changed to read as follows:

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

Since the OAM prefers that the Technical Support Document 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. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the section regarding Federal Rule Applicability for the wood furniture coating operations, and specifically under (a)(2) of this section.

37. In condition D.1.8, the testing requirement language has been changed to read:

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using ~~63.804(a)(1) or 63.804(a)(3)~~ **or 63.804(c)(2) or 63.804 (d)(3) or 63.804(e)(2)**, performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC ~~3-2-4~~ **3-6**. ~~If the Permittee elects to demonstrate compliance using 63.804(a)(2), no performance testing is required.~~

- (b) ~~However,~~ **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If the OAM requests, compliance with the limits specified in Conditions D.1.1, D.1.2, and D.1.5 shall be determined by performance tests conducted in accordance with Section C- Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

38. Condition D.1.10, HAP Content, has been replaced with a new condition, as follows:

D.1.10 HAP Content VOC Emissions

~~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.1.5 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.~~ **Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.**

The Table of Contents has also been changed as a result.

39. Condition D.2.5, Particulate Matter, has been changed to read as follows:

The baghouses for PM control shall be in operation at all times when the woodworking processes are in operation ~~and exhausting to the atmosphere.~~

40. Condition D.2.7, Baghouse Inspections, has been changed to:

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.

41. Condition D.2.8, Broken Bag or Failure Detection, has been modified to:

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

The reasons for this modification are discussed in the Response to Comment 12.

42. Condition D.2.9(b), Record Keeping Requirements, was changed to:

To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 **and the dates the vents are redirected.**

43. The reporting forms also have changes. The changes are as follows:

The Certification Form has a deletion in the first box of the phrase "~~Emergency/ Deviation Occurrence Reporting Form~~".

On the Emergency/ Deviation Occurrence Reporting Form, the last phrase on page 2 of 2, "~~Attach a signed certification to complete this report,~~" has been deleted. Also, the fax number has been changed to 317-233-6865**5967**.

Because the reporting for this source changed from a fixed monthly to a twelve consecutive month limit, the Quarterly Report Form has a new column added for this documentation.

And finally, the Quarterly Compliance Report is now called the "Quarterly Compliance **Monitoring** Report", and the language in the first box has been modified to read as:

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **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 box marked "No deviations occurred this reporting period"**.

Also on this form the last column marked "No Deviations" has been deleted. This is now listed in the second box of the form where the phrase **NO DEVIATIONS OCCURRED THIS REPORTING PERIOD** has been added. The third box now has the phrase "**THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**" added, and the phrase "~~LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE~~" has been deleted.

VOC and Particulate
From Surface Coating Operations

Company Name: **Mobel, Inc.**
 Address City IN Zip: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
 County: **Dubois**
 Permit #: **T-037-7536**
 Plant ID: **00081**
 Reviewer: **Melissa Groch**

Material	Density (lb/gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat (gal/unit)	Maximum (unit/hour)	Maximum (gal/hour)	Lb VOC / Lb Solids
Drawer Dip	7.08	95.00%	0.0%	95.0%	0.0%	0.47	50	23.50	19.00
Lacquer Thinner	7.08	100.00%	0.0%	100.0%	0.0%	0.1	50	5.00	ERR
Lt Oak Stain	7.84	63.65%	0.00%	63.7%	0.00%	0.47	50	23.50	1.75
High Build Lacquer	7.76	66.37%	0.00%	66.4%	0.00%	0.47	50	23.50	1.97
Lt Oak NGR Stain	6.62	99.85%	0.0%	99.9%	0.00%	0.47	50	23.50	665.67
Classics Rel Stain	6.87	96.65%	0.0%	96.7%	0.00%	0.47	50	23.50	28.85
WW Stain	7.49	75.57%	0.0%	75.6%	0.00%	0.47	50	23.50	3.09

Total 23.50

Material	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Controlled Particulate Potential tons/yr	PM Control Efficiency	Transfer Efficiency
Drawer Dip	6.73	6.73	158.06	3793.46	692.31	1.82	1.82	0%	95%
Lacquer Thinner	7.08	7.08	35.40	849.60	155.05	0.00	0.00	80%	50%
Lt Oak Stain	4.99	4.99	117.27	2814.45	513.64	146.67	29.33	80%	50%
High Build Lacquer	5.15	5.15	121.03	2904.78	530.12	134.31	26.86	80%	50%
Lt Oak NGR Stain	6.61	6.61	155.34	3728.08	680.37	0.51	0.10	80%	50%
Classics Rel Stain	6.64	6.64	156.04	3744.88	683.44	11.84	2.37	80%	50%
WW Stain	5.66	5.66	133.01	3192.35	582.60	94.17	18.83	80%	50%

Use the worst case coating for each case	TOTAL	VOC 692.31	PM10 146.67	PM10 29.33
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Potential VOC Pounds per Hour * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hr)*(gal/unit)*(lb/gal)*(1- Weight % Volatiles)*(1-Transfer efficiency)*(8760 hrs/yr)*(1 ton/2000 lbs)
 lb VOC/lb solids = Weight % organics/ (1-Weight % volatile)
 Total Emissions = Sum of all numbers
 Total = Sum of all Gallons of material (gal/unit)
 Weighted Ave. - pounds VOC per gallon = sum of [gallons of material (gal / hr)*Pounds of VOC per gallon of coating less water]/total (gal/hr)

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: Mobel, Inc.
Address City IN Zip: 2130 Industrial Park Road, Ferdinand, Indiana 47532
County: Dubois
Permit #: T-037-7536
Plant ID: 00081
Reviewer: Melissa Groch

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hr)	Weight % MEK	Weight % Toluene	Weight % Xylene	Weight % Trimethyl Bezeene	Weight % MIBK	Weight % Methanol	Weight % Glycol Ether	Weight % Butanol	Weight % Ethyl Benzene
Drawer Dip	7.08	0.47	50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Lacquer Thinner	7.08	0.1	50	11.80%	48.10%	14.20%	0.00%	0.00%	3.70%	0.00%	0.00%	0.00%
Lt Oak Stain	7.84	0.47	50	0.00%	0.00%	0.00%	1.20%	0.00%	0.00%	0.00%	0.00%	0.00%
High Build Lacquer	7.76	0.47	50	0.00%	0.00%	3.00%	0.00%	11.60%	0.00%	0.00%	0.00%	0.00%
Lt Oak NGR Stain	6.62	0.47	50	0.00%	1.10%	0.00%	0.00%	0.00%	98.00%	0.00%	0.00%	0.00%
Classics Rel Stain	6.87	0.47	50	1.40%	9.60%	4.50%	0.00%	0.00%	2.50%	4.10%	5.10%	1.00%
WW Stain	7.49	0.47	50	7.90%	13.10%	1.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Material	Density (lb/gal)	Gal of Mat (gal/hr)	MEK Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Trimethyl Benzene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Methanol Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Butanol Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Total Emissions (tons/yr)
Drawer Dip	7.08	23.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	7.08	5	18.30	74.58	22.02	0.00	0.00	5.74	0.00	0.00	0.00	120.63
Lt Oak Stain	7.84	23.5	0.00	0.00	0.00	9.68	0.00	0.00	0.00	0.00	0.00	9.68
High Build Lacquer	7.76	23.5	0.00	0.00	23.96	0.00	92.65	0.00	0.00	0.00	0.00	116.62
Lt Oak NGR Stain	6.62	23.5	0.00	7.50	0.00	0.00	0.00	667.77	0.00	0.00	0.00	675.26
Classics Rel Stain	6.87	23.5	9.90	67.88	31.82	0.00	0.00	17.68	28.99	36.06	7.07	199.41
WW Stain	7.49	23.5	60.90	100.99	9.25	0.00	0.00	0.00	0.00	0.00	0.00	171.15

Worst Case Single HAP Emission **60.90** **100.99** **31.82** **9.68** **92.65** **667.77** **28.99** **36.06** **7.07**

Worst Case Combination HAPs **675.26**

METHODOLOGY

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

**Appendix A: Emissions Calculations
Woodworking Emissions**

Company Name: Mobel, Inc.
Address City IN Zip: 2130 Industrial Park Road, Ferdinand, Indiana 47532
County: Dubois
Permit #: T-037-7536
Plant ID: 00081
Reviewer: Melissa Groch

Potential Emissions from the Woodworking Process

	<u>WW1</u>	<u>WW2</u>
equipment:	Dust Collectors - Baghouse	
Volume of Wood:	1870 Lbs/hr	1870 Lbs/hr
Material Loading:	0.0011 grains/acf	0.0018 grains/acf
Air Flow rate:	38000 acfm	39000 acfm
Control Efficiency:	99.00%	99.00%

After Control Emissions:

	<u>WW1</u>	<u>WW2</u>
Emissions: (gr/acf)(acf/min)(60 min/hr)(lb/7000 gr) =	0.358 lb/hr	0.602 lb/hr
(lb/hr)(ton/2000 lb)(8760 hrs/yr) =	1.569 tons/yr	2.636 tons/yr

Before Control Emissions:

Emissions: (tons/yr) / (1-control efficiency) =	156.9 tons/yr	263.6 tons/yr
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Allowable Emissions From Woodworking

Wood throughput: (lbs wood/hr)(ton/2000 lb) = 0.935 tons/hr each

326 IAC 6-3-2 (Process Operations - Particulate emissions limitations)

$$E = 4.10 P^{0.67} \quad \text{Where } E = \text{emissions in lbs/hr}$$

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

$$E = (4.10)(\text{wood throughput})^{0.67}$$

$$= 3.92 \text{ lbs/hr each}$$

$$= 17.167 \text{ tons/yr each}$$

Since 1.57 and 2.64 tons per year is less than the allowable emission rate of 17.167 tons per year, the woodworking operations are in compliance with 326 IAC 6-3-2.

HAPs
Wood Furniture NESHAP

Company Name: **Mobel, Inc.**
 Address City IN Zip: **2130 Industrial Park Road, Ferdinand, Indiana 47532**
 County: **Dubois**
 Permit #: **T-037-7536**
 Plant ID: **00081**
 Reviewer: **Melissa Groch**

Material	Density (lb/gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat (gal/unit)	Maximum (unit/hour)	Actual (gal/hour)
Drawer Dip	7.08	95.00%	0.0%	95.0%	0.0%	0.09	50	4.52
Lacquer Thinner	7.08	100.00%	0.0%	100.0%	0.0%	0.01	50	0.50
Lt Oak Stain	7.84	63.65%	0.0%	63.7%	0.0%	0.03	50	1.38
High Build Lacquer	7.76	66.37%	0.0%	66.4%	0.0%	0.03	50	1.33
Lt Oak NGR Stain	6.62	99.85%	0.0%	99.9%	0.0%	0.02	50	1.20
Classics Rel Stain	6.87	96.65%	0.0%	96.7%	0.0%	0.01	50	0.52
WW Stain	7.49	75.57%	0.0%	75.6%	0.0%	0.05	50	2.37

Total

Add worst case coating to all solvents

Material	Weight % HAPs	Pounds HAPs per gallon Coating	lb HAPs/hr	Pounds Solids per gallon Coating	lbs Solids per hr	lbs HAPs Per lbs Solids
Drawer Dip	0.00%	0.00	0.00	0.35	1.60	0.00
Lacquer Thinner	77.80%	5.51	2.75	0.00	0.00	n/a
Lt Oak Stain	1.20%	0.09	0.13	2.85	3.93	0.03
High Build Lacquer	14.60%	1.13	1.51	2.61	3.47	0.43
Lt Oak NGR Stain	99.10%	6.56	7.87	0.01	0.01	660.67
Classics Rel Stain	28.20%	1.94	1.01	0.23	0.12	8.42
WW Stain	22.20%	1.66	3.94	1.83	4.34	0.91

Weighted Averages

Weighted Average lb HAPs/lb Solids

At Maximum Usage, assuming even usage across all coatings, the coatings do not meet NESHAP standards. More accurate usage information will be necessary to show actual compliance, or non-compliance.

METHODOLOGY

Total = Sum of all Gallons of material (gal/hr)

Weighted Average (lbs VOC / gallon) = sum of [gallons of material (gal / hr) * Pounds of VOC per gallon of coating less water]/total (gal/hr)

Weighted Average (lbs HAPs / gallon) = sum of [gallons of material (gal / hr) * Pounds of HAPs per gallon of coating less water]/total (gal/hr)

Weighted Average (lbs Solids / gallon) = sum of [gallons of material (gal / hr) * Pounds of solids per gallon of coating less water]/total (gal/hr)

lb HAPs/lb Solids = weighted average HAPs / weighted average lbs Solids per gallon

Appendix A: Emissions Calculations
Natural Gas Combustion and #2 Fuel Oil
MMBtu/hr 0.3- < 10
Commercial Boiler

Company Name: Mobel, Inc.
Address City IN Zip: 2130 Industrial Park Road, Ferdinand, Indiana 47532
County: Dubois
Permit #: T-037-7536
Plant ID: 00081
Reviewer: Melissa Groch

Natural Gas

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.14

1.2

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons per year	0.01	0.01	0.00	0.06	0.00	0.01

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner =17, Flue gas recirculation = 36

Emission Factors for CO: Uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

#2 Fuel Oil

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur

0.05

0.14

8.76

Pollutant

	PM	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.01	0.31	0.09	0.00	0.02

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gal. x 1 gal per 0.14 MMBtu

Emission Factors are from AP 42, Tables 1.3-2, and 1.3-4 (SCC 1-03-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton