

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
(and *ENHANCED NEW SOURCE REVIEW*)  
OFFICE OF AIR MANAGEMENT**

**W.C. Redmon Company  
200 Harrison Avenue  
Peru, Indiana 46970**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.

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|---|----------------|
| Operation Permit No.: F103-7705-00002                                   |                |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>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) and presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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

Responsible Official: Samuel Redmon  
Source Address: 200 Harrison Avenue, Peru, Indiana 46970  
Mailing Address: P.O. Box 7, Peru, Indiana 46970  
SIC Code: 2434  
County Location: Miami  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD or Emission Offset Rules

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Seven (7) spray coating booths for coating wood furniture, with particulate matter emissions controlled by dry filters, exhausting through stacks B1 through B7;
- (b) Seven (7) dip tanks for coating wood furniture, exhausting through stack DT1;
- (c) Woodworking operations controlled by a cyclone and a baghouse in series, exhausting through stack CB1;
- (d) Woodworking operations controlled by cyclone #2, exhausting through stack C2;
- (e) Woodworking operations controlled by cyclone #3, exhausting through stack C3.

### A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

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

- (1) natural gas-fired combustion units including: eleven (11) space heaters, each with a heat input capacity less than ten million Btu per hour;
- (2) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (3) filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (4) degreasing operation that does not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6;
- (5) cleaners and solvent characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (6) infrared cure equipment;
- (7) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

- (8) water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (9) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (10) paved and unpaved roads and parking lots with public access;
- (11) purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (11) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (12) blowdown for any of the following: sight glass; boiler; compressors, pumps; and cooling tower;
- (13) gasoline generators not exceeding 110 horsepower;
- (14) diesel generators not exceeding 1600 horsepower;
- (15) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

## **SECTION B            GENERAL CONDITIONS**

### **B.1    General Requirements [IC 13-15] [IC 13-17]**

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The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

### **B.2    Definitions [326 IAC 2-8-1]**

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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 2-8-4(2)]**

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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 2-8-6]**

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

### **B.5    Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

### **B.6    Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]**

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- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.7    Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8    Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

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- (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. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

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

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

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

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

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

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (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) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

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

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than April 15 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

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (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 continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
  - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
  - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM , upon request and shall be subject to review and approval by IDEM, OAM .

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

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- (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 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM , within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM , by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (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 2-8-4(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or their substantial equivalent.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 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 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) Delivered by any method and received and stamped 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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM , any additional information identified as needed to process the application.

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

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

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

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- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).

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

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

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

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

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

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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(33).

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

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). 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.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(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 FESOP 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 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (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 current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.



- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

**B.28 Enhanced New Source Review [326 IAC 2]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also render the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable;
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) The potential to emit of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also render the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined 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.

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

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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

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

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The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]  
[40 CFR 61, Subpart M]**

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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 must be Indiana accredited is not federally enforceable.

**Testing Requirements [326 IAC 2-8-4(3)]**

**C.8 Performance Testing [326 IAC 3-2.1]**

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All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM, OAM.

The test protocol shall be submitted to:

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

no later than thirty-five (35) days before the intended test date. [326 IAC 3-2.1-2(a)]

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

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

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(33).

### **C.10 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

### **C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]**

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- (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) Written notification is to be 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
  - (3) Waste disposal site.

- (c) The Permittee shall postmark or deliver the notice 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

- (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.

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

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 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 part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), 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.

C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, 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 corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the 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 Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM reserves the right to utilize enforcement activities to resolve the non-compliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. 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.

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

**C.15 Monitoring Data Availability**

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- (a) 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) 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 in (a) above.

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]**

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

- (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 any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
  
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
  
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
  
- (c) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
  
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.



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

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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

Seven (7) paint booths, each equipped with air assisted airless spray guns, for wood furniture coating, with a maximum capacity at each spray booth of thirty-five and one half (35.5) units per hour, using dry filters for over spray control and exhausting at seven stacks, identified as B1 and B7. Seven (7) dip tanks, used for coating wood furniture, exhausting through stack DT1.

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

#### D.1.1 FESOP Limit [326 IAC 2-8]

- (a) Pursuant to 326 IAC 2-8, this facility shall use no more than 8.20 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 99 tons per 365 consecutive day period. Compliance with this limit also makes 326 IAC 2-2 not applicable. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) Pursuant to 326 IAC 2-8, this facility shall use no more than 0.75 tons of any single HAP, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of any single HAP to 9 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (c) Pursuant to 326 IAC 2-8, this facility shall use no more than 2.0 tons of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of any combination of HAPs to 24 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-7 do not apply.

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

The PM from the seven (7) paint booths and seven (7) dip tanks shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

#### **D.1.5 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC content and usage limitations contained in Condition D.1.1 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.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **D.1.6 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when the seven (7) paint booths are in operation.

##### **D.1.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the spray gun emissions while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed, except when the roof is covered with snow or ice, of the coating emissions from the stack and the presence of spray gun emissions on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when a spray gun emission, evidence of a spray gun emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.1.8 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.2, 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.1.2.
  - (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.1.7, the Permittee shall maintain a log of daily

overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Record Keeping Requirements

The record keeping requirements listed in this FESOP will also satisfy the record keeping requirements listed in the National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart JJ (Surface Coating) for minor sources.

#### D.1.10 Reporting Requirements

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.

## SECTION D.2 FACILITY OPERATION CONDITIONS

Woodworking operations with particulate matter controlled by a cyclone in series with a baghouse; additional woodworking operations controlled by cyclone #2; and additional woodworking operations controlled by cyclone #3. All three cyclones exhaust outside the plant; the baghouse exhausts inside the plant.

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

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

---

Pursuant to 326 IAC 6-3 (Process Operations), the following conditions shall apply:

- (a) Cyclone #1 and the baghouse shall be in operation at all times when the woodworking processes are in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 1.13 pounds per hour when operating at a process weight rate of 293 pounds per hour.
- (b) Cyclone #3 shall be in operation at all times when the wood chipper is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 1.62 pounds per hour when operating at a process weight rate of 500 pounds per hour.

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

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

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

#### D.2.2 Particulate Matter less than ten microns (PM10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the cyclone and baghouse shall be in operation at all times when the woodworking processes are in operation, and shall not exceed the allowable PM10 emission rate of 2.75 pounds per hour

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

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

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-8-5(1)]

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Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.5 Visible Emissions Notations**

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- (a) Daily visible emission notations of the woodworking stack exhausts 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 Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.6 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhausts.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

State Form 47738 (5-96)

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

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

Source Name: W.C. Redmon Company  
Source Address: 200 Harrison Avenue, Peru, Indiana 46970  
Mailing Address: P.O. Box 7, Peru, Indiana 46970  
FESOP No.: 103-7705-00002

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

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

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

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

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

Source Name: W.C. Redmon Company  
 Source Address: 200 Harrison Avenue, Peru, Indiana 46970  
 Mailing Address: P.O. Box 7, Peru, Indiana 46970  
 FESOP No.: 103-7705-00002

|  |                                    |
|--|------------------------------------|
| If a deviation has occurred, a separate copy of this report must be submitted for <b>each</b> monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report. |                                    |
| Stack/Vent ID:   |                                    |
| Control Equipment:<br>(ex: thermal oxidizer, scrubber, baghouses)  |                                    |
| Type of Parameter Monitored:<br>(ex: temperature, pressure drop, efficiency)   |                                    |
| 9 Continuously   | 9 Periodically, at a frequency of: |
| Parameter Operating Restrictions/Range:<br>(ex: 1,400°F, 2-4 psi pressure drop)  |                                    |
| Report Covers From:<br>(date: month/day/yr)  | To:                                |
| 9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.   |                                    |

|   | For Parameter Recorded Continuously | For Parameter Recorded Periodically |
|---|-------------------------------------|-------------------------------------|
| Total Unit Operating Time   |                                     |                                     |
| Total Time of Deviations<br>(Identify All Deviations)                 |                                     |                                     |
| Percent of Time Indicating Deviations<br>( $\frac{2}{1} \times 100$ ) |                                     |                                     |

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

State Form 47741 (5-96)



## OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

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

Source Name: W.C. Redmon Company  
Source Address: 200 Harrison Avenue, Peru, Indiana 46970  
Mailing Address: P.O. Box 7, Peru, Indiana 46970  
FESOP No.: 103-7705-00002

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

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

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

**FESOP Quarterly Report**

Source Name: W.C. Redmon Company  
Source Address: 200 Harrison Avenue, Peru, Indiana 46970  
Mailing Address: P.O. Box 7, Peru, Indiana 46970  
FESOP No.: 103-7705-00002  
Facility: surface coating spray booths and dip tanks  
Parameter: VOC usage, HAP usage  
Limit: 8.20 tons VOC per month, 0.75 tons any single HAP per month, 2.0 tons any combination of HAPs per month

YEAR: \_\_\_\_\_

|         | VOC Usage<br>(tons/month) | HAP Usage - combination<br>of all HAPs used<br>(tons/month) | HAP Usage - worst case<br>single HAP usage<br>(tons/month) |
|---------|---------------------------|---|--|
| 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

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

### Source Background And Description

**Source Name:** W.C. Redmon Company  
**Source Location:** 200 Harrison Avenue, Peru, Indiana 46960  
**County:** Miami  
**SIC Code:** 2434  
**Operation Permit No.:** F103-7705-00002  
**Permit Reviewer:** Nisha Sizemore

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from W.C. Redmon Company relating to the operation of a wood furniture manufacturing facility.

### Permitted Emission Units and Pollution Control Equipment

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

- (1) Seven (7) spray coating booths for coating wood furniture, with particulate matter emissions controlled by dry filters, exhausting through stacks B1 through B7;
- (2) Seven (7) dip tanks for coating wood furniture, exhausting through stack DT1;
- (3) Woodworking operations controlled by a cyclone and a baghouse in series, exhausting through stack CB1.

### Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (1) Woodworking operations controlled by cyclone #2, exhausting through stack C2;
- (2) Woodworking operations controlled by cyclone #3, exhausting through stack C3.

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

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

### Insignificant Activities

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

- (1) natural gas-fired combustion units including: eleven (11) space heaters, each with a heat input equal to or less than ten (10) million Btu per hour;
- (2) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (3) filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (4) degreasing operation that does not exceed 145 gallons per 12 month period, except if subject to 326 IAC 20-6;
- (5) cleaners and solvent characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (6) infrared cure equipment;
- (7) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (8) water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (9) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (10) paved and unpaved roads and parking lots with public access;
- (11) purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (11) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (12) blowdown for any of the following: sight glass; boiler; compressors, pumps; and cooling tower;
- (13) gasoline generators not exceeding 110 horsepower;
- (14) diesel generators not exceeding 1600 horsepower;
- (15) grinding and machining operations.

### Existing Approvals

This source has been operating under the following approvals:

- (1) CP 103-3660

### Enforcement Issue

- (1) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
  - (a) Woodworking operations controlled by cyclone #2, exhausting through stack C2;

- (b) Woodworking operations controlled by cyclone #3, exhausting through stack C3.
- (2) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

There are no Enforcement actions pending.

### Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on July 15, 1997.

### Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (3 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              | 36.0                            |
| PM-10           | 33.4                            |
| SO <sub>2</sub> | 0.10                            |
| VOC             | 217                             |
| CO              | 8.20                            |
| NO <sub>x</sub> | 33.0                            |

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

See attached spreadsheets for detailed calculations.

| HAP            | Potential Emissions (tons/year) |
|----------------|---------------------------------|
| xylene         | 20.5                            |
| ethyl benzene  | 19.2                            |
| glycol ether   | 13.4                            |
| toluene        | 1.17                            |
| 1,2 ethanediol | 0.15                            |
| TOTAL          | 54.4                            |

See attached spreadsheets for detailed calculations.

- (a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (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 emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit VOC of 99 tons per year, consisting of:
  - (i) 98.4 tons per year for the significant activities; and
  - (ii) 0.60 tons per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of 9.0 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

|                          | Limited Potential to Emit<br>(tons/year) |       |                 |      |      |                 |   |
|--------------------------|--|-------|-----------------|------|------|-----------------|---|
| Process/<br>facility     | PM                                       | PM-10 | SO <sub>2</sub> | VOC  | CO   | NO <sub>x</sub> | HAPs  |
| surface coating          | 29.1                                     | 29.1  | 0.00            | 98.4 | 0.00 | 0.00            | 24.0 for combination and 9.0 for any single |
| woodworking              | 12.0                                     | 12.0  | 0.00            | 0.00 | 0.00 | 0.00            | 0.00  |
| Insignificant Activities | 3.30                                     | 3.30  | 0.10            | 0.60 | 8.20 | 33.0            | 0.00  |
| Total Emissions          | 44.4                                     | 44.4  | 0.10            | 99.0 | 8.20 | 33.0            | 24.0 for combination and 9.0 for any single |

Attached Tables A and B summarize the permit conditions and requirements.

### County Attainment Status

The source is located in Miami County.

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

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) This source is not subject to the requirements of the National Emission Standards for

Hazardous Air Pollutants (NESHAP), Subpart JJ because it is not a major source of HAPs.

### **State Rule Applicability - Entire Source**

#### 326 IAC 5-1 (Visible Emissions Limitations)

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

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

#### 326 IAC 6-4 (Fugitive Dust Emissions)

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

### **State Rule Applicability - Surface Coating Operation**

#### 326 IAC 2-8-4 (FESOP)

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

The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 8.20 tons per month. The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to 0.75 tons per month. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to 2.0 tons per month.

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

Pursuant to this rule, the surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

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

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



alternative application of air-assisted airless spray.

### 326 IAC 6-3-2 (Process Operations)

The dry filters for overspray control shall be in operation at all times that the paint booths are in operation. The particulate matter (PM) overspray from the paint booths shall be limited by the following:

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

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

### State Rule Applicability - Woodworking Operation

#### 326 IAC 6-3 (Process Operations)

Pursuant to this rule, the following conditions shall apply:

- (a) Cyclone #1, cyclone #2, and the baghouse shall be in operation at all times when the woodworking processes are in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 1.13 pounds per hour.
- (b) Cyclone #3 shall be in operation at all times when the wood chipper is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 1.62 pounds per hour.

### Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The surface coating process has applicable compliance monitoring conditions as specified below:
  - (a) The amount of VOCs delivered to the applicators, the amount of any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Records must be kept of the type and amount of coatings used. Material Safety Data Sheets must be kept on site for each coating used during the quarter being reported.
  - (b) The recordkeeping requirements listed in this FESOP will also satisfy the recordkeeping requirements listed in the National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart JJ (Surface Coating) for minor sources.
  - (c) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To document compliance with 326 IAC 6-3-2 (c), observations shall be made daily of the overspray while at least one of the booths is in operation.
  - (d) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or any other abnormal emission is observed.
  - (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the VOC and HAP emissions must be limited to below Title V levels. The source must demonstrate compliance with the FESOP limit and with 326 IAC 6-3-2(c).

2. The woodworking process has applicable compliance monitoring conditions as specified below:
  - (a) Visible emissions notations of the cyclone stack exhausts shall be performed at least once per shift when the woodworking process is in operation. A trained employee will record whether emissions are normal or abnormal. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
  - (b) An inspection shall be performed each calendar quarter of all bags controlling woodworking operations. All defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.

### **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) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations.

### **Conclusion**

The operation of this wood furniture manufacturing facility will be subject to the conditions of the attached proposed FESOP No. F103-7705-00002.

Table (A)

|  |  |                         |  |  |
|--|--|-------------------------|--|--|
| <b>Stack/Vent ID:</b>                      |  | none                    |  |  |
| <b>Emission Unit:</b>                      |  | woodworking process     |  |  |
| <b>Alternative Scenario:</b>               |  | none                    |  |  |
| <b>Pollution Control Equipment:</b>        |  | cyclones and a baghouse |  |  |
| <b>General Description of Requirement:</b> | cyclones and baghouse shall operate at all times that woodworking is in operation, PM shall comply with 6-3, opacity shall comply with 5-1 |                         |  |  |
| <b>Numerical Emission Limit:</b>           | 1.13 pounds PM per hour from cyclones 1, 2, and baghouse, 1.62 pounds PM per hour from cyclone 3, 2.75 pounds PM10 per hour                |                         |  |  |
| <b>Regulation/Citation:</b>                | 326 IAC 6-3, 326 IAC 5-1, 326 IAC 2-8  |                         |  |  |
| <b>Compliance Demonstration:</b>           | visible emission checks and baghouse inspections   |                         |  |  |
| <b>PERFORMANCE TESTING</b>                 |  | N/A                     |  |  |
| <b>COMPLIANCE MONITORING</b>               |  |                         |  |  |
| <b>Monitoring Description:</b>             | visible emission checks on stacks exhausting outside the building, quarterly checks on baghouse bags                                       |                         |  |  |
| <b>Monitoring Method:</b>                  |  |                         |  |  |
| <b>Monitoring Regulation/Citation:</b>     | 326 IAC 2-8-5  |                         |  |  |
| <b>Monitoring Frequency:</b>               | once per shift / quarterly   |                         |  |  |
| <b>RECORD KEEPING</b>                      |  |                         |  |  |
| <b>Parameter/Pollutant to be Recorded:</b> | quarterly baghouse inspection results  |                         |  |  |
| <b>Recording Frequency:</b>                | quarterly  |                         |  |  |
| <b>Submittal Schedule of Reports:</b>      | upon request   |                         |  |  |
| <b>REPORTING REQUIREMENTS</b>              |  |                         |  |  |
| <b>Information in Report:</b>              |  |                         |  |  |
| <b>Reporting Frequency/Submittal:</b>      |  |                         |  |  |
| <b>Additional Comments:</b>                |  |                         |  |  |

Table (B)

|   |   |   |   |
|---|---|---|---|
| <b>Emission Unit:</b> surface coating operation                           |   |   |   |
| <b>Pollution Control Equipment:</b> HAPs -- none PM-- filters VOC -- none |   |   |   |
| <b>General Description of Requirement:</b>                                | 0.75 tons/month of any single HAP delivered to applicators & 2.0 tons/month of combination of all HAPs delivered to applicators   | use of filters is required  | 8.20 tons / month of VOCs delivered to the applicators                        |
| <b>Numerical Emission Limit:</b>  | 0.75 tons/mo. & 2.0 tons/mo.  | 0.54 tons / month   | 8.20 tons VOC/mo.   |
| <b>Regulation/Citation:</b>   | 326 IAC 2-8   | 326 IAC 2-8, and 326 IAC 6-3-2  | 326 IAC 8-2-12 & 326 IAC 2-8  |
| <b>Compliance Demonstration:</b>  | recordkeeping & reporting   | none  | recordkeeping and reporting   |
| <b>COMPLIANCE MONITORING</b>  |   |   |   |
| <b>Monitoring Description:</b>  |   | daily inspections of filters, weekly inspections of coating emissions |   |
| <b>Monitoring Method:</b>   |   | visual inspections  |   |
| <b>Monitoring Regulation/Citation:</b>                                    |   | 326 IAC 2-8-5   |   |
| <b>Monitoring Frequency:</b>  |   | daily/weekly  |   |
| <b>RECORD KEEPING</b>   |   |   |   |
| <b>Parameter/Pollutant to be Recorded:</b>                                | coating usage / HAPs  |   | coating usage / VOCs  |
| <b>Recording Frequency:</b>   | monthly   |   | monthly   |
| <b>Submittal Schedule of Reports:</b>                                     | quarterly   |   | quarterly   |
| <b>REPORTING REQUIREMENTS</b>   |   |   |   |
| <b>Information in Report:</b>   | amount of worst case single HAP delivered to the applicators plus the amount used for clean-up and amount of combination of all HAPs delivered to the applicators plus the amount used for clean-up |   | amount of VOCs delivered to the applicators plus the amount used for clean-up |
| <b>Reporting Frequency/Submittal:</b>                                     | quarterly   |   | quarterly   |

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

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

**W.C. Redmon Company  
200 Harrison Avenue  
Peru, Indiana 46960**

**F-103-7705, Plt ID-103-00002**

On September 5, 1997, the Office of Air Management (OAM) had a notice published in the Peru Daily Tribune, Peru, Indiana, stating that W.C. Redmon Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a wood furniture manufacturing facility. 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 October 24, 1997, Clean Manufacturing Technology and Safe Materials Institute on behalf of W.C. Redmon Company, submitted comments on the proposed FESOP. The summary of the comments is as follows:

Comment #1

W.C. Redmon should not be subject to 326 IAC 1-5-2 (Emergency Reduction Plans) because the FESOP limits the source potential to emit to less than 100 tons per year.

Response #1

The OAM agrees. This requirement has been left out of the final permit.

Comment #2

All of the spray booths and dip tanks were constructed in 1974; therefore, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) does not apply to any of these facilities.

Response #2

The OAM agrees. This requirement has been left out of the final permit.

Comment #3

In condition D.1.8 (a) and (b), please replace the word "overspray" with "spray gun emissions."

Response #3

The OAM does not see any difference between the two references. The requested change has been made in the final permit.

Comment #4

Condition D.1.8 (b) requires weekly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Because of possible poor weather conditions, it may become unsafe to view coating emissions from the stack.

Response #4

Condition D.1.8 (b) (now re-numbered as D.1.7 (b)) has been changed to the following:

Weekly inspections shall be performed, except when the roof is covered with snow or ice, of the coating emissions from the stack and the presence of spray gun emissions on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when a spray gun emission, evidence of a spray gun emission, or other abnormal emission is observed

Comment #5

Cyclone #2 is used only intermediately to convey accumulated dropout from cyclone #1 to a hopper off of cyclone #2. Cyclone #2 operation is not required to collect woodworking operation's dust. Thus, it should not be required to be in operation when woodworking operation are in operation. Only cyclone #1 should be required to be in operation.

Response #5

The OAM agrees. The requirement to operate cyclone #2 at all times that the woodworking process is in operation has been left out of the final permit.

Comment #6

The baghouse should not be required to be in operation at all times that the woodworking process is in operation because the baghouse exhausts inside the building. Since the baghouse exhausts inside the building, the compliance monitoring conditions should not be required for the baghouse.

Response #6

The baghouse is required to be in operation at all times that the woodworking process is in operation because the woodworking process would not comply with 326 IAC 6-3 (Process Operations) without the continuous operation of the baghouse. The OAM agrees that since the baghouse exhausts inside the building, the compliance monitoring requirements are unnecessary. The compliance monitoring conditions for the baghouse have been left out of the final permit.

Comment #7

The technical support document refers to the woodworking operations controlled by cyclones #2 and #3 as unpermitted facilities. Why are these facilities listed as unpermitted when both are in compliance with 326 IAC 6-3 (Process Operations)? Cyclone #2 was part of Redmon's previously approved air permit. Cyclone #3 was inadvertently left out of the originally approved air permit, but it has always operated in accordance with 326 IAC 6-3 (Process Operations).

**Response #7**

Calculations show that these facilities are in compliance with 326 IAC 6-3 (Process Operations). Listing the facilities as unpermitted facilities is not meant to imply that the facilities are or ever were in violation of any other rule, such as 326 IAC 6-3. Listing the facilities as unpermitted facilities only means that W.C. Redmon Company did not obtain the proper permit from OAM in order to construct and operate the facilities. Cyclone #2 is not listed on any of the permits previously issued to W.C. Redmon Company, nor is it listed in any of the permit applications previously submitted by W.C. Redmon Company; therefore, the OAM believes that cyclone #2 is an unpermitted facility. As stated in the above comment, the woodworking operations controlled by cyclone #3 were also never permitted.



**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MM Btu/hr 0.3 - < 10  
Commercial Boiler**

**Company Name: W.C. Redmon Company  
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970  
F: 103-7705-00002  
Reviewer: Nisha Sizemore**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.40

12.3

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/yr | 0.1  | 0.1  | 0.0 | 0.6   | 0.0 | 0.1  |

**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

