

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Styline Industries, Inc.
110 West Tenth Street
Huntingburg, Indiana 47542

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

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

Operation Permit No.: T037-8056-00102	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)]
- B.3 Enforceability [326 IAC 2-7-7(a)]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15]
- B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6(2)]
- B.23 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIONS

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

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

Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.13 Monitoring Methods [326 IAC 3]

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

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Plant #3 Spray Booths

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

- D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]
- D.1.2 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]
- D.1.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]
- D.1.4 Work Practice Standards [40 CFR 63.803]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 63, Subpart JJ]
- D.1.7 Particulate Matter (PM)
- D.1.8 Volatile Organic Compounds (VOC)

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

- D.1.9 Monitoring

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

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Plant #3 Machining

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

- D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]
- D.2.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]
- D.2.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]
- D.2.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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

- D.2.7 Broken or Failed Bag Detection

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

- D.2.8 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - Plant #5 Spray Booths

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

- D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]
- D.3.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]
- D.3.3 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]
- D.3.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]
- D.3.5 Work Practice Standards [40 CFR 63.803]
- D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 63, Subpart JJ]
- D.3.8 Volatile Organic Compounds (VOC)
- D.3.9 VOC Emissions
- D.3.10 Particulate Matter (PM)

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

- D.3.11 Monitoring

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

- D.3.12 Record Keeping Requirements
- D.3.13 Reporting Requirements

D.4 FACILITY OPERATION CONDITIONS - Plant #5 Machining

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

- D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]
- D.4.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]
- D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.4.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]
- D.4.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]
- D.4.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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

- D.4.7 Broken or Failed Bag Detection

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

- D.4.8 Record Keeping Requirements

D.5 FACILITY OPERATION CONDITIONS - Plant #5 Boiler

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

- D.5.1 Particulate Matter
- D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.6 FACILITY OPERATION CONDITIONS - Plant #8 Spray Booths

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

- D.6.1 Particulate Matter (PM) [326 IAC 6-1-2]
- D.6.2 Volatile Organic Compounds (VOC) [8-2-12]
- D.6.3 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]
- D.6.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]
- D.6.5 Work Practice Standards [40 CFR 63.803]
- D.6.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.6.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 63, Subpart JJ]

- D.6.8 Volatile Organic Compounds (VOC)
- D.6.9 Particulate Matter (PM)

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

- D.6.10 Monitoring

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

- D.6.11 Record Keeping Requirements
- D.6.12 Reporting Requirements

D.7 FACILITY OPERATION CONDITIONS - Plant #8 Machining

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

- D.7.1 Particulate Matter (PM) [326 IAC 6-1-2]
- D.7.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]
- D.7.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.7.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]
- D.7.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]
- D.7.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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

- D.7.7 Broken or Failed Bag Detection

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

- D.7.8 Record Keeping Requirements

D.8 FACILITY OPERATION CONDITIONS - Plant #8 Boiler

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

- D.8.1 Particulate Matter Emissions Limitations [326 IAC 6-1-9]
- D.8.2 Sulfur Dioxide (SO₂) Rules [326 IAC 7]
- D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.8.4 Visible Emissions Notations

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

- D.8.5 Record Keeping Requirements
- D.8.6 Reporting Requirements

D.9 FACILITY OPERATION CONDITIONS - Plant #9 Spray Booths

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

- D.9.1 Volatile Organic Compounds (VOC) [8-2-12]
- D.9.2 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]
- D.9.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]
- D.9.4 Work Practice Standards [40 CFR 63.803]
- D.9.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.9.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.9.7 Volatile Organic Compounds (VOC)
- D.9.8 Particulate Matter (PM)

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

D.9.9 Monitoring

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

D.9.10 Record Keeping Requirements

D.9.11 Reporting Requirements

D.10 FACILITY OPERATION CONDITIONS - Plant #9 Machining

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

D.10.1 Particulate Matter (PM) [326 IAC 6-1-2]

D.10.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

D.10.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.10.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]

D.10.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]

D.10.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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

D.10.7 Broken or Failed Bag Detection

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

D.10.8 Record Keeping Requirements

D.11 FACILITY OPERATION CONDITIONS - Wood/Coal-Fired Boiler (B-6)

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

D.11.1 Particulate Matter Emissions Limitations [326 IAC 6-1-2]

D.11.2 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60, Subpart Dc]

D.11.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

D.11.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.11.5 Sulfur Dioxide Emissions and Sulfur Content

D.11.6 Particulate Matter (PM)

D.11.7 Nitrogen Oxides (NOx)

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

D.11.8 Multi-clone and Flue-gas Reinjection System Inspections

D.11.9 Multiclone and Flue-gas Reinjection System Failure Detection

D.11.10 Visible Emissions Notations

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

D.11.11 Record Keeping Requirements

D.11.12 Reporting Requirements

D.12 FACILITY OPERATION CONDITIONS - Wood-Fired Boiler (B-3)

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

D.12.1 Particulate Matter Emissions Limitations [326 IAC 6-1-2]

D.12.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

D.12.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.12.4 Heat Input Limitation

D.12.5 Particulate Matter (PM)

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

D.12.6 Visible Emissions Notations

D.12.7 Cyclone Flyash Collector Inspections

D.12.8 Cyclone Flyash Collector Failure Detection

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

D.12.9 Record Keeping Requirements

D.12.10 Reporting Requirements

D.13 FACILITY OPERATION CONDITIONS - Plant #18 Machining

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

D.13.1 Particulate Matter (PM) [326 IAC 6-1-2]

D.13.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

D.13.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.13.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]

D.13.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]

D.13.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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

D.13.7 Broken or Failed Bag Detection

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

D.13.8 Record Keeping Requirements

D.14 FACILITY OPERATION CONDITIONS - Plant #18 Boiler

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

D.14.1 Particulate Matter Emissions Limitations [326 IAC 6-1-2]

D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.15 FACILITY OPERATION CONDITIONS - Insignificant Activities

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

D.15.1 Particulate Matter Emissions Limitations [326 IAC 6-1-2]

Certification

Emergency Occurrence Report

Quarterly Deviation and Compliance Monitoring Report

Semi-Annual Reports

Quarterly Reports

Semi-Annual Wood Furniture NESHAP reports (4)

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood office furniture manufacturing facility .

Responsible Official: Mr. Robert H. Menke, Jr.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
SIC Code: 2521
County Location: Dubois
County Status: Attainment area for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, Section 112 of the Clean Air Act
Major Source, under PSD Rules

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

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

- (1) Thirty (30) spray booths, identified as:
 - (a) Eight (8) spray booths located in Plant #3:
 - (1) Three (3) spray booths, constructed in 1976, identified as SB-1, SB-2 and SB-3, with a maximum capacity of 30,070 CFM for each unit, using dry filters for control and exhausting to stacks 1 and 2.
 - (2) Five (5) spray booths, one (1), identified as SB-10, constructed in 1986 and four (4), identified as SB4, SB-5, SB-6, SB-7, constructed before 1977, with a maximum capacity of 24, 460 CFM for each unit, using dry filters for control and exhausting to stacks 4, 5, 6, 7, and 8.
 - (b) Nine (9) spray booths located in Plant #5:
 - (1) Six (6) spray booths, constructed in 1970, identified as SB-1 through SB-6, with a maximum capacity of 17, 750 CFM, using dry filters for control and exhausting to stacks 1-6.
 - (2) One (1) spray booth, constructed in 1970, identified as SB-7, with a maximum capacity of 10,955 CFM, using a dry filter for control and exhausting to stack 7.
 - (3) One (1) spray booth, constructed in 1970, identified as SB-8, with a maximum capacity of 7,915 CFM, using a dry filter for control and exhausting to stack 8.

- (4) One (1) spray booth, constructed in 1999, identified as SB-9, with a maximum capacity of 125 pounds of finished wood per hour, using a dry filter for control and exhausting to stack 9.
- (c) Seven (7) spray booths located in Plant #8:
 - (1) One (1) spray booth, constructed in July 1977, identified as SB-1 with a maximum capacity of 14,145 CFM, and one (1) spray booth constructed pre-1977, identified as SB-2 with a maximum capacity of 16,605 CFM, both spray booths using a dry filter for control and exhausting to stacks 5 and 6.
 - (2) Two (2) spray booths, constructed in 1993, identified as SB-3 and SB-4 with a maximum capacity of 16,605 CFM for each unit, and one (1) spray booth constructed in 1993, identified as SB-5 with a maximum capacity of 11,105 CFM, all spray booths using dry filters for control and exhausting to stacks 7, 8 and 9.
 - (3) One (1) spray booth, constructed in 2000, identified as Shade Spray Booth SB-4A, with a maximum capacity of 0.24 lbs wood per hour, using dry filters for control and exhausting to stack 8.
 - (4) One (1) spray booth, constructed in 2000, identified as Touch-up and Repairs Booth SB-6, with a maximum capacity of 0.24 lbs wood per hour, using dry filters for control and exhausting to stack 10.
- (d) Eight (8) spray booths located in Plant #9:
 - (1) Eight spray booths, constructed pre-1977, identified as SB-1 through SB-8, with a maximum capacity of 24,460 CFM for each unit, each using dry filters for control, and exhausting to stacks 1-8.
- (2) Machining operations, identified as:
 - (a) Machining operations located at Plant #3, constructed in 1977, equipped with a baghouse for particulate control, identified as Moldow Baghouse. The maximum capacity of the baghouse is: Moldow = 24,000 CFM; and exhausting to stacks 9 and 10.
 - (b) Machining operations located at Plant #5, constructed September 30, 1977, equipped with a baghouse for particulate control, with a maximum capacity of 15,000 CFM and exhausting to stack 9.
 - (c) Machining operations located at Plant #8, constructed in 1989, using a baghouse, with a maximum capacity of 30,000 CFM, and exhausting to stack 10.
 - (d) Machining operations located at Plant #9, constructed in 1961, using two (2) baghouses for particulate control, with a maximum capacities of 7,000 CFM and 25,000 CFM, and both exhausting to stack 9.
 - (e) Machining operations located at Plant #18 (109 West 10th Street, Huntingburg, Indiana), constructed in 1996, using a baghouse for particulate control, with a maximum capacity of 7,000 CFM and exhausting to stack 1.

- (3) One (1) coal/wood-fired boiler located in Plant #15, identified as B-6, constructed in 1997, with a maximum capacity of 12.0 mmBtu/hr, equipped with a multi-clone particulate collector and a flue gas reinjection system for NOx, and exhausting to stack 1.
- (4) One (1) wood-fired boiler located in Plant #8, identified as B-2, constructed July 1969, reconstructed in 2000, with a maximum capacity of 200hp (6.7 mmBtu/hr), exhausting to stack 11.
- (5) One (1) wood-fired boiler located in Plant #15, identified as B-3, constructed in 1992, with a maximum capacity of 24.9 million Btu per hour (mmBtu/hr), equipped with a cyclone flyash collector for particulate control and exhausting to stack 1.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

Two natural gas-fired boilers:

- (1) A natural gas-fired boiler located in Plant #5, identified as B-7, with a maximum capacity of 200hp (6.7 mmBtu/hr) and exhausting to stack 14.
- (2) A natural gas-fired boiler located in Plant #18, identified as B-5, with a maximum capacity of 30hp (1.0 mmBtu/hr) and exhausting to stack 2.

Four (4) natural gas-fired drying ovens:

- (1) Three (3) natural gas-fired drying ovens, located in Plant #8, identified as O-1, O-2 and O-3, with maximum capacity of 1.0 million Btu per hour (mmBtu/hr) for each unit.
- (2) One (1) natural gas-fired drying oven, located in Plant #5, identified as O-4, with a rated heat input of 0.9 million Btu per hour (mmBtu/hr).

One (1) natural gas-fired Air Make Up Unit, located in Plant #8, with a maximum capacity of 6.6 million Btu per hour (mmBtu/hr).

- (b) The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

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

A.5 Source Determination

This source has been determined to be one source based on the seven (7) plants located on

contiguous properties, having the same SIC codes and owned by one (1) company. There will be one plant identification number: 037-00102 and one Part 70 Operating Permit number: 037-8056.

SECTION B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]**
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.
- B.2 Permit Term [326 IAC 2-7-5(2)]**
This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.
- B.3 Enforceability [326 IAC 2-7-7(a)]**
Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**
The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).
- B.5 Severability [326 IAC 2-7-5(5)]**
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**
This permit does not convey any property rights of any sort, or any exclusive privilege.
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**
- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish records directly to the U.S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
 - (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- (a) Where specifically designated by this permit or required by an applicable requirement, 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 shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
 - (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
 - (c) A responsible official is defined at 326 IAC 2-7-1(34).
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
 - (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (c) The annual compliance certification report shall include the following:

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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

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

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

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action

brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

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

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

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile, to:

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an

emergency has the burden of proof.

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

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.
 - (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
 - (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
 - (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
 - (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
- B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Report or its equivalent. However, if a State or Federal requirement specifies any deviations that are required to be reported according to a different schedule, then those deviations shall be reported according to the schedule stated in the applicable requirement.

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-7-5(6)(C)]. The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

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

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the

Permittee's copy of this permit; and

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
 - (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
 - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (A) A brief description of the change within the source;
 - (B) The date on which the change will occur;
 - (C) Any change in emissions; and
 - (D) 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 Aresponsible official@ as defined by 326 IAC 2-7-1(34).

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

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

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

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

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

such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

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

B.23 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

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

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]
(a) Notification requirements apply to each owner or operator. If the combined amount of

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source

Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

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

Compliance with applicable requirements shall be documented as required by this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any newly required monitoring, no more than ninety (90) days after receipt of this permit or by a later date specified by an applicable requirement. If a previous or existing approval or applicable requirement mandates compliance monitoring, the source will continue or initiate such monitoring. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule for newly required monitoring an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

C.13 Monitoring Methods [326 IAC 3]

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

The ERP does not require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

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

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

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification

statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

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

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

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

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consisting in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates, by reference, information contained in other documents, the Permittee shall identify, as part of the compliance monitoring plan, the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRPs shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Reasonable response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
- (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
 - (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
- (a) The Permittee shall submit an annual emission statement certified pursuant to the

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

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

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

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

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

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

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

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

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report. Any deviation from the requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(do) not require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviations Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR

82.158.

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Plant #3

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

Spray Booths

Eight (8) spray booths located in Plant #3:

- (1) Three (3) spray booths, constructed in 1976, identified as SB-1, SB-2 and SB-3, with a maximum capacity of 30,070 CFM for each unit, using dry filters for control and exhausting to stacks 1 and 2.
- (2) Five (5) spray booths, one (1), identified as SB-10, constructed in 1986 and four (4), identified as SB-4, SB-5, SB-6, SB-7, constructed before 1977, with a maximum capacity of 24,460 CFM for each unit, using dry filters for control and exhausting to stacks 4, 5, 6, 7, and 8.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

The particulate matter (PM) from each of the surface coating operations located in Plant #3, shall be limited to 0.03 grain per dry standard cubic foot (dscf).

D.1.2 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

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

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

- (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.4 Work Practice Standards [40 CFR 63.803]

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63, Subpart JJ]
Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times the spray booths are in operation.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using

Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 1 through 8, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.3.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.1.11 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted within sixty (60) days following the compliance date of November 21, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

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

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

and

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Plant #3

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

Machining

Machining operations located at Plant #3, constructed in 1977, equipped with a baghouse for particulate control, identified as Moldow Baghouse. The maximum capacity of the baghouse is 24,000 CFM; and exhausting to stacks 9 and 10.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

- D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]
The particulate matter (PM) from each of the machining operations located in Plant #3 shall be limited to 0.03 grain per dry standard cubic foot (dscf).
- D.2.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]
The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:
- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
 - (b) The opacity from each baghouse shall not exceed ten percent (10%).
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

- D.2.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]
Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
- (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.
- D.2.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]
The baghouses for all machining operations being used for PM control shall be in operation at all times the machining operations are in operation and exhausting to the outside atmosphere.
- D.2.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]
An inspection shall be performed each calendar quarter of all bags controlling the woodworking

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

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

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission observations of each baghouse stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Plant #5

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

Spray Booths

Nine (9) spray booths located in Plant #5:

- (1) Six (6) spray booths, constructed in 1970, identified as SB-1 through SB-6, with a maximum capacity of 17, 750 CFM, using dry filters for control and exhausting to stacks 1-6.
- (2) One (1) spray booth, constructed in 1970, identified as SB-7, with a maximum capacity of 10,955 CFM, using a dry filter for control and exhausting to stack 7.
- (5) One (1) spray booth, located in Plant #5, constructed in 1970, identified as SB-8, with a maximum capacity of 7,915 CFM, using a dry filter for control and exhausting to stack 8.
- (6) One (1) spray booth, constructed in 1999, identified as SB-9, with a maximum capacity of 125 pounds of finished wood per hour, using a dry filter for control and exhausting to stack 9.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

The particulate matter (PM) from each of the surface coating operations, located in Plant #5 shall be limited to 0.03 grain per dry standard cubic foot (dscf).

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The emissions from spray booth SB-9:

- (a) shall be limited to less than 40.0 tons of VOC for SB-9, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) shall be limited to less than 25.0 tons of PM for SB-9 and less than 15.0 tons of PM₁₀ for SB-9. This limit is required to limit the potential to emit of PM and PM₁₀ to less than 25 tons of PM and 15 tons of PM₁₀ per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.3.3 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.3.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.3.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date.

The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40

- CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63, Subpart JJ]
Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.3.8 Volatile Organic Compounds (VOC)
Compliance with the VOC content and usage limitations contained in Conditions D.3.2 and D.3.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.9 VOC Emissions
Compliance with Condition D.3.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.3.10 Particulate Matter (PM)
The dry filters for PM control shall be in operation at all times the spray booths are in operation.

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

D.3.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 1 through 9, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.3.12 Record Keeping Requirements

- (a) To document compliance with Condition D.3.11 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.3.4.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Conditions D.3.2, 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 Conditions D.3.2.
 - (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.
- (d) To document compliance with Condition D.3.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this

permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

- (b) An Initial Compliance Report to document compliance with Condition D.3.4 and the Certification form, shall be submitted within sixty (60) days following the compliance date of November 21, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.4 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

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

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

and

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

SECTION D.4 FACILITY OPERATION CONDITIONS

Plant #5

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

Machining

- (1) Machining operations located at Plant #5, constructed in September 1977, equipped with a baghouse for particulate control, with a maximum capacity of 15,000 CFM and exhausting to stack 9.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]

The particulate matter (PM) from each of the machining operations located in Plant #5 shall be limited to 0.03 grain per dry standard cubic foot (dscf).

D.4.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

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

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

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.4.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]

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

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

D.4.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]

The baghouses for all machining operations being used for PM control shall be in operation at all times the machining operations are in operation and exhausting to the outside atmosphere.

D.4.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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

optional when venting to the indoors. All defective bags shall be replaced.

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

D.4.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission observations of the baghouse stack exhaust.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Plant #5

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

Boilers

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (1) A natural gas-fired boiler located in Plant #5, identified as B-7, with a maximum capacity of 200hp (6.7 mmBtu/hr) and exhausting to stack 14.
- (2) One (1) natural gas-fired drying oven, located in Plant #5, identified as O-4, with a rated heat input of 0.9 million Btu per hour (mmBtu/hr).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.5.1 Particulate Rules: Particulate Emissions Limitations [326 IAC 6-1-2]

The boiler or natural gas-fired drying oven shall emit a particulate matter content of no greater than 0.01 grains per dry standard cubic feet (gr/dscf).

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

SECTION D.6

FACILITY OPERATION CONDITIONS

Plant #8

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

Spray Booths

Seven (7) spray booths located in Plant #8:

- (1) One (1) spray booth, constructed in July 1977, identified as SB-1 with a maximum capacity of 14,145 CFM, and one (1) spray booth constructed pre-1977, identified as SB-2 with a maximum capacity of 16,605 CFM, both spray booths using a dry filter for control and exhausting to stacks 5 and 6.
- (2) Two (2) spray booths, constructed in 1993, identified as SB-3 and SB-4 with a maximum capacity of 16,605 CFM for each unit, and one (1) spray booth constructed in 1993, identified as SB-5 with a maximum capacity of 11,105 CFM, all spray booths using dry filters for control and exhausting to stacks 7, 8 and 9.
- (3) One (1) spray booth, constructed in 2000, identified as Shade Spray Booth SB-4A, with a maximum capacity of 0.24 lbs wood per hour, using dry filters for control and exhausting to stack 8.
- (4) One (1) spray booth, constructed in 2000, identified as Touch-up and Repairs Booth SB-6, with a maximum capacity of 0.24 lbs wood per hour, using dry filters for control and exhausting to stack 10.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.6.1 Particulate Matter (PM) [326 IAC 6-1-2]

The particulate matter (PM) from each of the surface coating operations located in Plant #8, shall be limited to 0.03 grain per dry standard cubic foot (dscf).

D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets from SB-3, SB-4, SB-5, and SB-6 shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth

(0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.6.3 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The input VOC from spray booth SB-6 shall be limited to less than 40.0 tons of VOC for SB-6, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.6.4 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.6.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1998.

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

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.6.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date.

The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

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

D.6.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.6.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63, Subpart JJ]

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.6.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.6.3 and D.6.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.10 VOC Emissions

Compliance with Condition D.6.3 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.6.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times the spray booths are in operation.

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

D.6.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 5 through 10, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

D.6.13 Record Keeping Requirements

- (a) To document compliance with Condition D.6.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.6.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.6.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Conditions D.6.3, 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 Conditions D.6.3.
 - (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.
- (d) To document compliance with Condition D.6.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.6.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) An Initial Compliance Report to document compliance with Condition D.6.5 and the Certification form, shall be submitted within sixty (60) days following the compliance date of November 21, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.6.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

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

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

and

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

SECTION D.7 FACILITY OPERATION CONDITIONS

Plant #8

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

Machining

- (a) Machining operations located at Plant #8, constructed in 1989, using a baghouse, with a maximum capacity of 30,000 CFM, and exhausting to stack 10.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

- D.7.1 Particulate Matter (PM) [326 IAC 6-1-2]
The particulate matter (PM) from each of the machining operations located in Plant #8 shall be limited to 0.03 grain per dry standard cubic foot (dscf).
- D.7.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]
The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:
- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- D.7.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

- D.7.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]
Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
- (1) The baghouse shall be inspected.
- (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.
- D.7.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]
The baghouses for all machining operations being used for PM control shall be in operation at all times the machining operations are in operation and exhausting to the outside atmosphere.
- D.7.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]
An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three

months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

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

D.7.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.7.8 Record Keeping Requirements

- (a) To document compliance with Condition D.7.4, the Permittee shall maintain records of daily visible emission observations of each baghouse stack exhaust.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.8 FACILITY OPERATION CONDITIONS

Plant #8

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

Boilers

One (1) wood-fired boiler located in Plant #8, identified as B-2, constructed July 1969, reconstructed in 2000, with a maximum capacity of 200hp (6.7 mmBtu/hr), exhausting to stack 11.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.8.1 Particulate Matter: Dubois County [326 IAC 6-1-9]
Pursuant to 326 IAC 6-1-9 (Nonattainment area particulate limitations: Dubois County), the particulate emissions limitations for the 6.7 mmBtu/hr wood-fired boiler located in Plant #8 (formerly Huntingburg Wood Products) are limited to 9.0 tons per year and 0.60 lb/mmBtu of particulate matter.

D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

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

- D.8.3 Visible Emissions Notations
- (a) Visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

- D.8.4 Record Keeping Requirements
- (a) To document compliance with Condition D.8.3 the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
 - (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.9

FACILITY OPERATION CONDITIONS

Plant #9

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

Spray Booths

Eight spray booths located in Plant #9:

- (1) Eight spray booths, constructed pre-1977, identified as SB-1 through SB-8, with a maximum capacity of 24,460 CFM for each unit, each using dry filters for control, and exhausting to stacks 1-8.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.9.1 Particulate Emission Limitations [326 IAC 6-1-2]

The particulate matter (PM) from the following each of the surface coating operations located in Plant #9 shall be limited to 0.03 grain per dry standard cubic foot (dscf).

D.9.2 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.9.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1998.

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

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.9.4 Work Practice Standards [40 CFR 63.803]

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

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

D.9.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.9.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63, Subpart JJ]

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.9.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.9.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.9.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times the spray booths are in operation.

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

D.9.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 1 through 8, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.9.10 Record Keeping Requirements

- (a) To document compliance with Condition D.9.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.9.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.9.3.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.9.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.9.11 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.9.3 and the Certification form, shall be submitted within sixty (60) days following the compliance date of November 21, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.9.3 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

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

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

and

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

SECTION D.10 FACILITY OPERATION CONDITIONS

Plant #9

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

Machining

- (a) Machining operations located at Plant #9, constructed in 1961, using two (2) baghouses for particulate control, with a maximum capacities of 7,000 CFM and 25,000 CFM, and both exhausting to stack 9.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.10.1 Particulate Matter (PM) [326 IAC 6-1-2]

The particulate matter (PM) from each of the machining operations located in Plant #9 shall be limited to 0.03 grain per dry standard cubic foot (dscf).

D.10.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

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

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

D.10.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.10.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]

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

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

D.10.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]

The baghouses for all machining operations being used for PM control shall be in operation at all times the machining operations are in operation and exhausting to the outside atmosphere.

D.10.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three

months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

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

D.10.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.10.8 Record Keeping Requirements

- (a) To document compliance with Condition D.10.4 the Permittee shall maintain records of daily visible emission observations of each baghouse stack exhaust.
- (b) To document compliance with Condition D.10.6 the Permittee shall maintain records of the results of the inspections required under Condition D.10.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.11

FACILITY OPERATION CONDITIONS

Plant #15

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

One (1) coal/wood-fired boiler located in Plant #15, identified as B-6, constructed in 1997, with a maximum capacity of 12.0 mmBtu/hr, equipped with a multi-clone particulate collector and a flue gas reinjection system for NO_x, and exhausting to stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.11.1 Particulate Matter [326 IAC 6-1-2]

The 12.0 mmBtu/hr coal/wood-fired boiler located in Plant #15, identified as B-6, is subject to 326 IAC 6-1-2. The boiler shall emit a particulate matter content of no greater than 0.6 pounds per mmBtu.

D.11.2 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60, Subpart Dc]

The 12.0 mmBtu/hr wood/coal-fired boiler located in Plant #15. Pursuant to the New Source Performance Standard, 326 IAC 12, (New Source Performance Standards), SO₂ emissions from the boiler shall be limited to 1.2 pounds per million Btu, per 40 CFR Part 60.42c(e)(2), when burning only coal or coal in combination with wood.

D.11.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The coal and wood being fed to the boiler shall be limited to 6,832 tons of wood per twelve (12) consecutive month period and 3,504 tons of coal per twelve (12) consecutive month period. For every ton of coal that is used, wood usage shall be decreased by 1.81 tons. This limit is required to limit the potential to emit of PM, PM₁₀, SO₂ and NO_x to less than 25 tons of PM, 15 tons of PM₁₀, 40 tons of SO₂ and 40 tons of NO_x per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.11.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.11.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification;

or

- (b) Analyzing the coal sample to determine the sulfur content via the procedures in 40 CFR 60, Appendix A, Method 19:

For affected facilities combusting coal, coal samples shall be collected daily in an as-fired condition at the inlet to the steam generating unit and analyzed for sulfur content and heat content according the Method 19. Method 19 provides procedures for converting these measurements into the format to be used in calculating the average SO₂ input rate;

or

- (3) Install, calibrate, maintain, and operate a CEMS for measuring SO₂ concentrations at the outlet of the steam generating unit pursuant to 40 CFR 60.46c(a).

D.11.6 Particulate Matter (PM)

The multi-cyclones used for PM control shall be in operation at all times the boiler is in operation.

D.11.7 Nitrogen Oxides (NO_x)

The flue-gas reinjection system for NO_x control shall be in operations at all times the boiler is in operation.

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

D.11.8 Multi-cyclone and Flue-gas Reinjection System Inspections

An inspection shall be performed each calendar quarter of all multi-cyclones and the flue-gas reinjection system controlling the boiler. All defective equipment shall be replaced or repaired.

D.11.9 Multi-Cyclone or Flue-gas Reinjection System Failure Detection

In the event that a multi-clone or flue-gas reinjection system failure has been observed:

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

D.11.10 Visible Emissions Notations

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

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

D.11.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.11.2 and D.11.3, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the coal sulfur limit applies at all times including periods of startup, shutdown,

and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual coal usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.11.10 the Permittee shall maintain records of visible emission notations of the multi-clone particulate collector stack exhaust.
- (c) To document compliance with Condition D.11.8, the Permittee shall maintain records of the results of the inspections required under Condition D.11.8.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.11.12 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.11.2 in any compliance period when coal and/or wood was combusted shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A quarterly summary of the information to document compliance with Condition D.11.3 in any compliance period when coal and/or wood was combusted shall be submitted to the address listed in Section C - General Reporting Requirements, 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.12 FACILITY OPERATION CONDITIONS

Plant #15

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

One (1) wood-fired boiler located in Plant #15, identified as B-3, constructed in 1992, with a maximum capacity of 24.9 million Btu per hour (mmBtu/hr), de-rated to 13.0 mmBtu/hr, equipped with a cyclone flyash collector for particulate control and exhausting to stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.12.1 Particulate Matter [326 IAC 6-1-2]

The 13.0 mmBtu/hr wood-fired boiler located in Plant #15, identified as B-3 is subject to 326 IAC 6-1-2. The boiler shall emit a particulate matter content of no greater than 0.6 pounds per mmBtu.

D.12.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 037-1992, issued on June 25, 1991, the wood being fed to Boiler B-3 shall be limited to 7,740 tons of wood per twelve (12) consecutive month. This limit is required to limit the potential to emit of PM and PM₁₀ to less than 25 tons of PM and 15 tons of PM₁₀ per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.12.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.12.4 Heat Input Limitation

The heat input rate from boiler B-3, located in Plant #15, shall not exceed 13.0 mmBtu/hr.

D.12.5 Particulate Matter

The cyclone flyash collector for the boiler being used for PM control shall be in operation at all times the boiler is in operation.

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

D.12.6 Visible Emissions Notations

- (a) Visible emission notations of the boiler cyclone flyash collector stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that

specific process.

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

D.12.7 Cyclone Flyash Collector Inspections

An inspection shall be performed each calendar quarter of the cyclone flyash collector controlling the boiler. All defective equipment shall be replaced or repaired.

D.12.8 Cyclone Flyash Collector Failure Detection

In the event that a cyclone flyash collector failure has been observed:

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

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

D.12.9 Record Keeping Requirements

- (a) To document compliance with Condition D.12.2, the Permittee shall maintain records of monthly usage of wood combusted in the boiler.
- (b) To document compliance with Condition D.12.6, the Permittee shall maintain records of visible emission notations of the cyclone flyash collector stack exhaust.
- (c) To document compliance with Condition D.12.7, the Permittee shall maintain records of the results of the inspections required under Condition D.12.7.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.13.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.12.2 in any compliance period when wood was combusted, wood usage and the boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, 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.13 FACILITY OPERATION CONDITIONS

Plant #18

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

Machining

- (a) Machining operations located at Plant #18, constructed in 1996, using a baghouse for particulate control, with a maximum capacity of 7,000 CFM and exhausting to stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.13.1 Particulate Matter (PM) [326 IAC 6-1-2]

The particulate matter (PM) from each of the machining operations located in Plant #18 shall be limited to 0.03 grain per dry standard cubic foot (dscf).

D.13.2 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

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

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

D.13.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.13.4 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]

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

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

D.13.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]

The baghouses for all machining operations being used for PM control shall be in operation at all times the machining operations are in operation and exhausting to the outside atmosphere.

D.13.6 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three

months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

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

D.13.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.13.8 Record Keeping Requirements

- (a) To document compliance with Condition D.13.4, the Permittee shall maintain records of daily visible emission observations of each baghouse stack exhaust.
- (b) To document compliance with Condition D.13.6, the Permittee shall maintain records of the results of the inspections required under Condition D.13.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.14

FACILITY OPERATION CONDITIONS

Plant #18

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

Boilers

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (a) A natural gas-fired boiler located in Plant #18, identified as B-5, with a maximum capacity of 30hp (1.0 mmBtu/hr) and exhausting to stack 2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.14.1 Particulate Rules: Particulate Emissions Limitations [326 IAC 6-1-2]

The boiler shall emit a particulate matter content of no greater than 0.01 grains per dry standard cubic feet (gr/dscf).

D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

SECTION D.15

FACILITY OPERATION CONDITIONS

Entire Source

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

Insignificant Activities:

The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.15.1 Particulate Matter (PM) [326 IAC 6-1-2]

The particulate matter (PM) from each of the insignificant activities, shall be limited to 0.03 grains per dry standard cubic foot (dscf). Compliance is shown by the use of dry filters as control.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Styline Industries, Inc.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
Part 70 Permit No.: T037-8056-00102

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Styline Industries, Inc.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
Part 70 Permit No.: T037-8056-00102

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <ul style="list-style-type: none">C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

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

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

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

Source Name: Styline Industries, Inc.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
Part 70 Permit No.: T037-8056-00102

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Styline Industries, Inc.
 Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
 Part 70 Permit No.: T037-8056-00102
 Facility: One (1) spray booth, constructed in 1999, located in Plant #5, identified as SB-9, with a maximum capacity of 125 pounds of finished wood per hour, using a dry filter for control and exhausting to stack 9.
 Parameter: VOC
 Limit: (a) shall be limited to less than 40.0 tons of VOC for SB-9, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

YEAR: _____

Month	Column 4 VOC (tons)	Column 5 VOC (tons)	Column 4 + Column 5
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

Part 70 Quarterly Report

Source Name: Styline Industries, Inc.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
Part 70 Permit No.: T037-8056-00102
Facility: One (1) spray booth, identified as Touch-up and Repairs Booth SB-6, located in Plant #8, with a maximum capacity of 0.24 lbs wood per hour, using dry filters for control and exhausting to stack 10.
Parameter: VOC
Limit: (a) shall be limited to less than 40.0 tons of VOC for SB-6, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

YEAR: _____

Month	Column1 VOC (tons)	Column 2 VOC (tons)	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

Part 70 Quarterly Report

Source Name: Styline Industries, Inc.
 Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
 Part 70 Permit No.: T037-8056-00102
 Facility: coal/wood-fired boiler located in Plant #15, identified as B-6
 Parameter: coal and wood usage
 Limit: The coal and wood being fed to the boiler shall be limited to 6,832 tons of wood per twelve (12) consecutive month period and 3,504 tons of coal per twelve (12) consecutive month period.

YEAR: _____

Month	wood usage (tons)	coal usage (tons)	wood usage (tons)	coal usage (tons)	Column 1 + Column 2
	This Month	This Month	Previous 11 Months	Previous 11 Months	12 Month Total
Month 1					
Month 2					
Month 3					

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

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

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

Part 70 Quarterly Report

Source Name: Styline Industries, Inc.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
Part 70 Permit No.: T037-8056-00102
Facility: coal/wood-fired boiler located in Plant #15, identified as B-3
Parameter: coal and wood usage
Limit: The wood being fed to Boiler B-3 shall be limited to 7,740 tons of wood per twelve (12) consecutive month.

YEAR: _____

Month	wood usage (tons)	wood usage (tons)	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

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

Source Name: Styline Industries, Inc.
 Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
 Part 70 Permit No.: T037-8056-00102
 Facility: Surface Coating located in Plant #3
 Parameter: VOC and VHAPs - NESHAP
 Limit:

- (1) Finishing operations - 1.0 lb VHAP/lb Solids
- (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
- (3) All other thinner mixtures - 10% VHAP content by weight
- (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
- (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
- (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

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

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

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

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

Source Name: Styline Industries, Inc.
 Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
 Part 70 Permit No.: T037-8056-00102
 Facility: Surface Coating located in Plant #5
 Parameter: VOC and VHAPs - NESHAP
 Limit:

- (1) Finishing operations - 1.0 lb VHAP/lb Solids
- (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
- (3) All other thinner mixtures - 10% VHAP content by weight
- (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
- (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
- (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
 Deviation has been reported on: _____

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

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

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

Source Name: Styline Industries, Inc.
 Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
 Part 70 Permit No.: T037-8056-00102
 Facility: Surface Coating located in Plant #8
 Parameter: VOC and VHAPs - NESHAP
 Limit:

- (1) Finishing operations - 1.0 lb VHAP/lb Solids
- (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
- (3) All other thinner mixtures - 10% VHAP content by weight
- (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
- (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
- (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
 Deviation has been reported on: _____

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

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

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

Source Name: Styline Industries, Inc.
 Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
 Part 70 Permit No.: T037-8056-00102
 Facility: Surface Coating located in Plant #9
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations - 1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
 Deviation has been reported on: _____

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

Indiana Department of Environmental Management Office of Air Management

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

Source Name: Styline Industries
Source Location: 110 West 10th Street, Huntingburg, Indiana 47542
County: Dubois
SIC Code: 2521
Operation Permit No.: T037-8056-00102
Permit Reviewer: Kimberly Titzer

On November 2, 1998, the Office of Air Management (OAM) had a notice published in *The Herald*, Jasper, Indiana, stating that Styline Industries had applied for a Part 70 Operating Permit to operate a manufacturing facility for the manufacturing of wood office furniture. Another notice was published in *The Herald*, Jasper, Indiana on September 15, 2000 after significant revisions had been made to both the Technical Support Document and Part 70 Operating Permit. 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.

Comments were received from Styline Industries Corporation on October 19, 2000.

Comment 1: Compliance Determination Requirements - Volatile Organic Compounds (VOC)
Why are VOCs referenced to the NESHAP?

Response 1: Subsection (b)(3) of the NESHAP language contains a limitation for VOC content in strippable spray booths. Therefore, the Compliance Determination Requirement references VOC in the NESHAP. No change was made to the permit as a result of this comment.

Comment 2: Is there Quarterly Reporting for Plant #3 spray booth #9 only?

Response 2: SB-9, located in Plant #5 and SB-6, located in Plant #8 both are limited to less than 40 tons per year with Quarterly Reporting for each booth.

Comment 3: Technical Support Document
The operations from Plant #6 were moved to Styline Plant #1, which operates under a separate Title V permit number: T037-5915-00054. Therefore, the address reference to Plant #6 should be removed.

Response 3: The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. However, the TSD should not have included Plant #6 in the Source Definition portion of the TSD. Therefore, the TSD should have read:

Source Definition

This wood office furniture manufacturing company consists of six (6) plants:

- (1) Plant 3 is located at 704 North Chestnut Street, Huntingburg, Indiana (Plant ID 037-00047); and
- (2) Plant 5 is located at 210 West 9th Street, Huntingburg, Indiana (Plant ID 037-00022); and

- ~~(3)~~ Plant 6 is located at 908 North Chestnut Street, Huntingburg, Indiana (Plant ID 037-00078); and
- ~~(4)~~**(3)** Plant 8 is located at 1008 North Chestnut Street, Huntingburg, Indiana (Plant ID 037-00035); and
- ~~(5)~~**(4)** Plant 9 is located at 602 West 12th Street, Huntingburg, Indiana (Plant ID 037-00021); and
- ~~(6)~~**(5)** Plant 15 is located at 209 West 9th Street, Huntingburg, Indiana (Plant ID 037-00076); and
- ~~(7)~~**(6)** Plant 18 is located at 109 West 10th Street, Huntingburg, Indiana (Plant ID 037-00029).

Comment 4: The following clarifications should be made to the calculation sheets:

- (a) indicate plant numbers, not just boiler Ids
- (b) Boilers 3 and 6 in plant #15 do not share the same stack
- (c) Boiler 4, identified as B-4 on the HAP emissions calculations page, was a boiler removed from the permit and should be removed from the calculations.

Response 4: The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore no changes have been made as a result of this comment.

However, the permit has been changed to reflect two separate stacks in Plant #15 as follows:

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

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

- (3) One (1) coal/wood-fired boiler located in Plant #15, identified as B-6, constructed in 1997, with a maximum capacity of 12.0 mmBtu/hr, equipped with a multi-clone particulate collector and a flue gas reinjection system for NO_x, and exhausting to stack ~~4~~ **2**.

SECTION D.11

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

One (1) coal/wood-fired boiler located in Plant #15, identified as B-6, constructed in 1997, with a maximum capacity of 12.0 mmBtu/hr, equipped with a multi-clone particulate collector and a flue gas reinjection system for NO_x, and exhausting to stack ~~4~~ **2**.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 5: Boiler B-1, located in Plant #3 is not operational and the stack has been removed. No plans to re-operate have been made.

Response 5: Since the boiler still remains at the source, it was to be included in the permit. However, since Styline wishes to remove the unit from the permit, pre-approval from IDEM, OAM shall be obtained to re-construct and operate this unit in the future. Section D.3 has been removed from the permit. All other D-Sections have been renumbered accordingly. The Table of Contents has also been updated. Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

(1) The following changes have been made to the General Reporting Requirements, Condition C.20, as follows:

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

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit,~~
~~†The source shall submit a Semi-Annual~~ **the attached Quarterly Deviation and Compliance**
Monitoring Report or its equivalent. Any deviation from the permit requirements, and the date(s) of
each deviation , **the cause of the deviation, and the response steps taken** must be reported. **This**
report shall be submitted within thirty (30) days of the end of the reporting period. The
Quarterly Deviation and Compliance Monitoring Report shall include the certification by the
“responsible official” as defined by 326 IAC 2-7-1 (34).

The following changes have been made to the reporting forms to incorporate changes made to the B.16 Deviations condition (see pages #8 and #9 for these changes) and the C.20 General Reporting Requirements condition:

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

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION EMERGENCY OCCURRENCE REPORT

Source Name: Styline Industries, Inc.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
Part 70 Permit No.: T037-8056-00102

This form consists of 2 pages

Page 1 of 2

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

~~—2.— This is a deviation, reportable per 326 IAC 2-7-5(3)(C)~~

~~— The Permittee must submit notice in writing within ten (10) calendar days~~

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the ~~Emergency/Deviation~~ Emergency:

Describe the cause of the ~~Emergency/Deviation~~Emergency: _____

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

Page 2 of 2

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

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

A certification is not required for this report.

The following report has replaced the original Semi-Annual Compliance Monitoring Report.

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

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

Source Name: Styline Industries, Inc.
Source Address: 110 West Tenth Street, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
Part 70 Permit No.: T037-8056-00102

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This

report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked **NO deviations occurred this reporting period**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

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

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

Attach a signed certification to complete this report.

- (2) The following changes were made to the following boiler and conditions, based on the de-rating of the heat input of this boiler. The boiler had been derated because it tested out of compliance at the higher level. Until the boiler can pass a stack test at the higher level, the permit will read as follows:

SECTION D.13 (now D.12) FACILITY OPERATION CONDITIONS

Plant #15

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

One (1) wood-fired boiler located in Plant #15, identified as B-3, constructed in 1992, with a maximum capacity of 24.9 million Btu per hour (mmBtu/hr), **de-rated to 13 mmBtu/hr**, equipped with a cyclone flyash collector for particulate control and exhausting to stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.12.1 Particulate Matter [326 IAC 6-1-2]

The ~~24.9~~ **13.0** mmBtu/hr wood-fired boiler located in Plant #15, identified as B-3 is subject to 326 IAC 6-1-2. The boiler shall emit a particulate matter content of no greater than 0.6 pounds per mmBtu.

Compliance Determination Requirements

(Adding the following new Condition D.12.4.)

D.12.4 **Heat Input Limitation**

The heat input rate from boiler B-3, located in Plant #15, shall not exceed 13.0 mmBtu/hr.

- (3) B.1 (Permit No Defense) has been deleted. This is not in IC13, but IDEM does have the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to B.14 (Permit Shield). B.14 provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. All other B conditions have been re-numbered as a result of this change.

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

~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

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

- (4) B.13 (Emergency Provisions) (now B.12) a reference to the Emergency Occurrence Report Form has been added to B.13(b)(5). The emergency form is for emergencies only, and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence has been deleted. Since we know it is a TV source, then we also know the malfunction rule has been superceded by the emergency rule. Paragraph (f) ~~compliance~~ has been changed to ~~accordance~~.

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

(b)

(5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** notice, either ~~in writing by mail or facsimile, of the emergency~~ to:

(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.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ in **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (5) B.14 (Permit Shield) (now B.13) some of the language from B.1 has been added to this condition.

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under**

326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit~~, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (6) B.19 (Permit Amendment or Modification) (now B.18) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore this condition has been revised to clarify that. EPA has also requested this change.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

- (7) B.24 (Transfer of Ownership or Operational Control) (now B.23) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore this condition has been revised to clarify that. EPA has also requested this change.

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

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

- (8) B.16 (Deviations from Permit Requirements and Conditions) (now B.15) we are no longer requiring sources to report deviations in 10 days. Now they will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since we relaxed the 10 day notification to a quarterly report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, 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, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

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

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

(b)
~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

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

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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

(9) Significant Source Modification 037-12241-00102 was issued on December 4, 2000. The following conditions from the source modification were incorporated into the Title V permit as follows:

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

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

(c) Five (5) spray booths located in Plant #8:

(4) One (1) spray booth, constructed in 2000, identified as Touch-up and Repairs Booth SB-6, with a maximum capacity of 0.24 lbs wood per hour, using dry filters for control and exhausting to stack 10.

SECTION D.6 FACILITY OPERATION CONDITIONS

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

Spray Booths

Five (5) spray booths located in Plant #8:

(4) One (1) spray booth, constructed in 2000, identified as Touch-up and Repairs Booth SB-6, with a maximum capacity of 0.24 lbs wood per hour, using dry filters for control and exhausting to stack 10.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets from SB-3, SB-4, SB-5, and **SB-6** shall utilize one of the following application methods:

D.6.3 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The input VOC from spray booth SB-6 shall be limited to less than 40.0 tons of VOC for SB-6, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.6.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions **D.6.3** and D.6.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.10 VOC Emissions

Compliance with Condition D.6.3 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.6.13 Record Keeping Requirements

- (c) **To document compliance with Conditions D.6.3, 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 Conditions D.6.3.**
- (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.**

D.6.14 Reporting Requirements

- (a) **A quarterly summary of the information to document compliance with Condition D.6.3 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.**

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: Styline Industries, Inc.
Source Location: 1002 North Chestnut, Huntingburg, Indiana 47542
County: Dubois
SIC Code: 2521
Operation Permit No.: T037-8056-00102
Permit Reviewer: Kimberly Titzer

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Styline Industries, Inc. relating to the manufacturing of wood office furniture.

Source Definition

This wood office furniture manufacturing company consists of seven (7) plants:

- (1) Plant 3 is located at 704 North Chestnut Street, Huntingburg, Indiana (Plant ID 037-00047); and
- (2) Plant 5 is located at 210 West 9th Street, Huntingburg, Indiana (Plant ID 037-00022); and
- (3) Plant 6 is located at 908 North Chestnut Street, Huntingburg, Indiana (Plant ID 037-00078); and
- (4) Plant 8 is located at 1008 North Chestnut Street, Huntingburg, Indiana (Plant ID 037-00035); and
- (5) Plant 9 is located at 602 West 12th Street, Huntingburg, Indiana (Plant ID 037-00021); and
- (6) Plant 15 is located at 209 West 9th Street, Huntingburg, Indiana (Plant ID 037-00076); and
- (7) Plant 18 is located at 109 West 10th Street, Huntingburg, Indiana (Plant ID 037-00029).

Since the seven (7) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered as one (1) source being issued one permit number: T037-8056 and one plant identification number: 037-00102.

Styline Industries, Inc. also acquired another plant, Plant #1, previously named Executive Furniture. However, Plant #1 has been determined to be a separate source from the seven (7) plants that represent Styline Industries Inc. above, based on separate operations, no support between locations, non-contiguous sources and separate Part 70 Operating Permits.

Permitted Emission Units and Pollution Control Equipment

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

- (1) Thirty (30) spray booths, identified as:
 - (A) Eight (8) spray booths located in Plant #3:
 - (1) Three (3) spray booths, constructed in 1976, identified as SB-1, SB-2

and SB-3, with a maximum capacity of 30,070 CFM for each unit, using dry filters for control and exhausting to stacks 1 and 2.

- (2) Five (5) spray booths, one (1), identified as SB-10, constructed in 1986 and four (4), identified as SB4, SB-5, SB-6, SB-7, constructed before 1977, with a maximum capacity of 24, 460 CFM for each unit, using dry filters for control and exhausting to stacks 3, 4, 5, 6, 7, and 8.
- (B) Nine (9) spray booths located in Plant #5:
- (1) Six (6) spray booths, constructed in 1970, identified as SB-1 through SB-6, with a maximum capacity of 17, 750 CFM, using dry filters for control and exhausting to stacks 1-6.
 - (2) One (1) spray booth, constructed in 1970, identified as SB-7, with a maximum capacity of 10,955 CFM, using a dry filter for control and exhausting to stack 7.
 - (3) One (1) spray booth, located in Plant #5, constructed in 1970, identified as SB-8, with a maximum capacity of 7,915 CFM, using a dry filter for control and exhausting to stack 8.
 - (4) One (1) spray booth, constructed in 1999, identified as SB-9, with a maximum capacity of 125 pounds of finished wood per hour, using a dry filter for control and exhausting to stack 9.
- (C) Five (5) spray booths located in Plant #8:
- (1) One (1) spray booth, constructed in July 1977, identified as SB-1 with a maximum capacity of 14,145 CFM, and one (1) spray booth constructed pre-1977, identified as SB-2 with a maximum capacity of 16,605 CFM, both spray booths using a dry filter for control and exhausting to stacks 5 and 6.
 - (2) Two (2) spray booths, constructed in 1993, identified as SB-3, SB-4 and SB-5 with a maximum capacity of 16,605 CFM for each unit, and one (1) spray booth constructed in 1993, identified as SB-5 with a maximum capacity of 11,105 CFM, all spray booths using dry filters for control and exhausting to stacks 7, 8 and 9.
- (D) Eight spray booths located in Plant #9:
- (1) Eight spray booths, constructed pre-1977, identified as SB-1 through SB-8, with a maximum capacity of 24,460 CFM for each unit, each using dry filters for control, and exhausting to stacks 1-8.
- (2) Machining operations, identified as:
- (A) Machining operations located at Plant #3, constructed in 1977, equipped with a baghouse for particulate control, identified as Moldow Baghouse. The maximum capacity of the baghouse is 24,000 CFM; and exhausting to stacks 9 and 10.
 - (B) Machining operations located at Plant #5, constructed in September 1977, equipped with a baghouse for particulate control, with a maximum capacity of 15,000 CFM and exhausting to stack 9.

- (C) Machining operations located at Plant #8, constructed in 1989, using a baghouse, with a maximum capacity of 30,000 CFM, and exhausting to stack 10.
 - (D) Machining operations located at Plant #9, constructed in 1961, using two (2) baghouses for particulate control, with maximum capacities of 7,000 CFM and 25,000 CFM, and both exhausting to stack 9.
 - (E) Machining operations located at Plant #18, constructed in 1996, using a baghouse for particulate control, with a maximum capacity of 7,000 CFM and exhausting to stack 1.
- (3) One (1) coal-fired boiler located in Plant #3, identified as B-1, constructed before August 1, 1977, with a maximum capacity of 300 hp (10.0 mmBtu/hr), exhausting to stack 12.
 - (4) One (1) coal/wood-fired boiler located in Plant #15, identified as B-6, constructed in 1997, with a maximum capacity of 12.0 mmBtu/hr, equipped with a multi-clone particulate collector and a flue gas reinjection system for NOx, and exhausting to stack 1.
 - (5) One (1) wood-fired boiler located in Plant #8, identified as B-2, constructed July 1969, reconstructed in 2000, with a maximum capacity of 200hp (6.7 mmBtu/hr), exhausting to stack 11.
 - (6) One (1) wood-fired boiler located in Plant #15, identified as B-3, constructed in 1992, with a maximum capacity of 24.9 mmBtu/hr, equipped with a cyclone flyash collector for particulate control and exhausting to stack 1.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no new facilities to be reviewed during this review process.

Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) Two natural gas-fired boilers:
 - (1) A natural gas-fired boiler located in Plant #5, identified as B-7, with a maximum capacity of 200hp (6.7 mmBtu/hr) and exhausting to stack 14.
 - (2) A natural gas-fired boiler located in Plant #18, identified as B-5, with a maximum capacity of 30hp (1.0 mmBtu/hr) and exhausting to stack 2.
 - (b) Four (4) natural gas-fired drying ovens:
 - (1) Three (3) natural gas-fired drying ovens, located in Plant #8, identified as O-1, O-2 and O-3, with maximum capacity of 1.0 million Btu per hour (mmBtu/hr) for each unit.
 - (2) One (1) natural gas-fired drying oven, located in Plant #5, identified as O-

4, with a rated heat input of 0.9 million Btu per hour (mmBtu/hr).

- (c) One (1) natural gas-fired Air Make Up Unit, located in Plant #8, with a maximum capacity of 6.6 million Btu per hour (mmBtu/hr).
- (2) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (3) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F); or
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (4) The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (5) Closed loop heating and cooling systems.
- (6) Infrared cure equipment.
- (7) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (8) Paved and unpaved roads and parking lots with public access.
- (9) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (10) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (11) The following structural steel and bridge fabrication activities:
 - (a) Using 80 tons or less of welding consumables.
- (12) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (13) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (14) 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.
- (15) On-site fire and emergency response training approved by the department.

Existing Approvals

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

- (1) Construction Permit (CP) 037-2880, issued on January 25, 1993; and
- (2) CP 037-1992, issued on June 25, 1991; upgraded to CP 037-8439, issued on July 23, 1997; and
- (3) Operating Permit (OP) 19-09-90-0302, issued on January 30, 1987; and
- (4) Exemption (Ex) 037-3126, issued on December 14, 1993; and
- (5) Ex 037-8542, issued on June 16, 1997; and
- (6) Exemption Qualification (ExQual) 037-9917, issued on August 27, 1998; and
- (7) ExQual 037-10169, issued on October 16, 1998; and
- (8) CP 037-3008, issued on February 24, 1994; and
- (9) OP 19-10-90-0292, issued on November 17, 1986; and
- (10) OP 19-10-90-0293, issued on November 17, 1986; and
- (11) OP 19-03-91-0326, issued on October 9, 1987; and
- (12) Letter of Registration (Reg) 19-01-85-0200, issued on April 25, 1985; and
- (13) Reg 19-11-80-0124, issued on February 23, 1982; and
- (14) CP 037-1858, issued on July 11, 1990; and
- (15) Administrative Amendment (AA) 037-10744, issued on April 23, 1999; and
- (16) Minor Source Modification (MSM) 037-10893, issued on June 1, 1999; and
- (17) MSM 037-11836, issued on June 1, 2000; and
- (18) Permit No. 037-12241, undetermined, not issued yet.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) CP 037-1992, issued on June 25, 1991

Operation Condition: Incinerator

Reason not incorporated: It was determined that 326 IAC 4-2-2 does not apply to the 24.9 mmBtu/hr boiler located in Plant #15, because the wood being used as fuel is not considered solid waste.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:
Unless otherwise stated, information used in this review was derived from the application and

additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on December 18, 1996. Additional information received on December 26, 1996 and February 12, 1997 and April 9, 1997 and January 5, 2000 makes the Part 70 permit application administratively complete.

A notice of completeness letter was mailed to the source on April 14, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (Appendix A: pages 1-19)

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	301.95
PM-10	310.21
SO ₂	191.72
VOC	574.876
CO	87.3
NO _x	117.3

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

HAPs	Potential Emissions (tons/year)
<i>Xylene</i>	55.5
<i>Toluene</i>	61.5
<i>Methyl Ethyl Ketone</i>	78.1
<i>Methanol</i>	772.3
<i>Others</i>	13.9
TOTAL	981.3

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of particulate matter less than ten (10) microns (PM10), volatile organic compounds (VOC), and sulfur dioxide (SO₂) 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 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the emissions statement submitted for the year 1998 inventory:

Pollutant	Actual Emissions (tons/year)
PM	11.68
PM-10	7.949
SO ₂	0.160
VOC	179.45
CO	17.518
NO _x	1.021
HAP (specify)	no information submitted

*No information submitted for particulate matter from surface coating operations

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)					
	PM	PM-10	SO ₂	VOC	CO	NO _x
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Plant #9 SB1-SB5 (pre-1977)	0.03 gr/dscf (6-1-2)	7.1 Potential emission	N/A	>250	N/A	N/A
Plant #3 (pre-1977) (machining)	0.03 gr/dscf (6-1-2)	N/A	N/A	N/A	N/A	N/A
Plant #5 SB1-SB8 (pre-1977)	0.03 gr/dscf (6-1-2)	N/A	N/A	N/A	N/A	N/A
Plant #9 (pre-1977) (machining)	0.03 gr/dscf (6-1-2)	8.80 Potential emission	N/A	N/A	N/A	N/A
Plant #3 SB4-SB7 (pre-1977)	0.03 gr/dscf (6-1-2)	4.9 Potential emission	N/A	N/A	N/A	N/A
Plant #8 Boiler 2 (wood/coal) (pre-1977)	2.8 (6-1-9)	15.4 potential emission	55.75 potential emission	27.08 potential emission	11.6 potential emission	17.52 potential emission
Plant #18 Boiler5 (nat. gas) (pre-1977)	0.01 (gr/dscf) (6-1-2)	N/A	N/A	N/A	N/A	N/A

Plant #9 SB6-SB8 (pre-1977)	0.03 gr/dscf (6-1-2)	4.6 Potential emission	N/A	N/A	N/A	N/A
Plant #8 SB1, SB2 (pre-1977)	0.03 (6-1-2)	N/A	N/A	16.5 Potential emission	N/A	N/A
Plant #3 SB1,SB2,SB3 (pre-1977)	0.03 gr/dscf (6-1-2)	N/A	N/A	N/A	N/A	N/A
Plant #5 (const. 9/30/77) (machining)	0.03 (6-1-2)	N/A	N/A	N/A	N/A	N/A
Plant #3 SB10 (const. 1986)	0.03 gr/dscf (6-1-2)	N/A	N/A	9.7 Potential emission	N/A	N/A
Plant #8 Boiler1 (coal) (const. 1988)	0.6 (lb/mmBtu) (6-1-2)	5.18 Potential emission	1.6lb/mm Btu (Art. 7)	N/A	1.00 Potential emission	33.85 Potential emission
Plant #8 (const. 1989) (machining)	0.03 gr/dscf (6-1-2)	N/A	N/A	N/A	N/A	N/A
Plant #5 Boiler4 (nat. gas) (const. 1990)	0.01 (gr/dscf) (6-1-2)	0.3 Potential emission	0.02 Potential emission	0.2 Potential emission	1.2 Potential emission	4.9 Potential emission
Plant #15 Boiler3 (wood) (const. 1992)	24.0 (PSD)	14.0 (PSD)	0.6 Potential emission	1.3 Potential emission	49.1 Potential emission	2.8 Potential emission
Plant #8 SB3, SB4, SB5 (const. 1993)	0.03 gr/dscf	N/A	N/A	28.41 Potential emission	N/A	N/A
Plant #6 (const. 1995) (machining)	0.03 gr/dscf (6-1-2)	N/A	N/A	N/A	N/A	N/A
Plant #18 (const. 1996) (machining)	0.03 (6-1-2)	8.8 Potential emission	N/A	N/A	N/A	N/A
Plant #15 Boiler6 (wood/coal) (const. 1997)	24.0 (PSD)	14.0 (PSD)	39.0 (PSD)	26.28 Potential emission	23.1 Potential emission	39.0 (PSD)

Plant #5 SB9 (const. 1999)	24.0 (PSD)	14.0 (PSD)	N/A	39.0 (PSD)	N/A	N/A
----------------------------------	---------------	---------------	-----	---------------	-----	-----

Source Status

This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories. All units listed as pre-1977 units emit potential emissions greater than 250 tons per year of VOC. Therefore, upon PSD rule applicability on August 7, 1977, any unit after this date, emitting criteria pollutants above PSD thresholds shall be limited to less than PSD thresholds to be considered a Minor Modification under PSD rules, or be subject to PSD review.

County Attainment Status

The source is located in Dubois County.

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

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

Federal Rule Applicability

- (a) The 12.0 mmBtu/hr wood/coal-fired boiler located in Plant #15, identified as B-6, is subject to the New Source Performance Standards, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). Pursuant to 326 IAC 12 (New Source Performance Standards), the owner or operator shall comply with the requirements and standards from 40 CFR 60.40c, Subpart Dc, which will apply to B-6.
 - (1) SO₂ emissions from the boiler shall be limited to 1.2 pounds per million Btu, pursuant to 40 CFR Part 60.42c(e)(2), when burning only coal or coal in combination with wood.
 - (2) Compliance and performance test methods and procedures for SO₂ pursuant to 40 CFR Part 60.44c(a), (b), (c), (e) and (j) be followed.
 - (3) Emission monitoring for SO₂ pursuant to 40 CFR Part 60.46c(d) be followed.
 - (4) Reporting and record keeping requirements pursuant to 40 CFR Part 60.48c(a)(1) and (3), (b), (d), (e), (g) and (i) be followed. Any required reports 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) The 24.9 mmBtu/hr wood-fired boiler located in Plant #15, identified as B-3, is subject to the New Source Performance Standards, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). 40 CFR 60.42c (SO₂ emission limitations) does not apply, because the boiler does not combust coal or fuel oil. 40 CFR 60.43c (PM emissions limitations) requires a capacity of greater than or equal to 30 mmBtu/hr. The boiler has a maximum capacity of 24.9 mmBtu/hr. Therefore, only the record keeping requirements apply, pursuant to 40 CFR 60.48c.
- (c) The 6.7 mmBtu/hr wood-fired boiler located in Plant #8, identified as B-2, is not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR 60.4, Subpart Dc). The provisions of 40 CFR 60, Subpart Dc do not apply, because Subpart requires a capacity of greater than or equal to 10 mmBtu/hr. The boiler has a maximum capacity of 6.7 mmBtu/hr. Therefore, the provisions do not apply to the boiler.
- (d) The spray booths in Plants #3, #5, #8, and #9 are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart JJ).

The wood furniture surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart JJ, and 326 IAC 20-14. Pursuant to 40 CFR 63, Subpart JJ, and 326 IAC 20-14, the wood furniture manufacturing operations are subject to the following conditions:

- (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources in 40 CFR 63, Subpart JJ, Table 3.
- (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:
 - (a) Excluding adhesives covered in 40 CFR 63.802(2)(i) and all aerosol adhesives and contact adhesives applied to nonporous substrates; the VHAP content of the adhesive shall not exceed 1.0 lb VHAP/lb solids
- (3) The wood furniture manufacturing operations shall be subject to the work practice standards as indicated in 40 CFR 63.803.
- (4) The wood furniture manufacturing operations shall be subject to the compliance procedure and monitoring requirements as indicated in 40 CFR 63.804.
- (5) The wood furniture manufacturing operations shall be subject to the performance test methods as indicated in 40 CFR 63.805.
- (6) The wood furniture manufacturing operations shall be subject to the record keeping and reporting requirements as indicated in 40 CFR 63.806 and 40 CFR 63.807.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 18, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration [PSD])

The source is considered a major source pursuant to VOC emissions greater than PSD thresholds at the time of the date of applicability for PSD. Due to timeframe and limitations to be considered a Minor Modification according to PSD rules, the source has not gone through PSD review.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of particulate matter, VOCs and SO₂. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source.

The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity)

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

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

State Rule Applicability - Machining Operations (Woodworking)

The source has requested that the machining operations located in Plants #3, #5, #8, #9 and #18 be considered insignificant. The baghouses utilized for these locations fit the description for insignificant activities pursuant to 326 IAC 2-7-1(21)(G)(xxix). This Part 70 permit has incorporated the requirements for insignificant activities.

Opacity

The opacity from the machining operations shall not exceed 10% when vented to the atmosphere.

Baghouse and Cyclone limitations

The baghouse and cyclones do not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) or forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter of less than ten (10) microns in excess of three thousandths (0.003) or one-hundredth (0.01) grain per dry standard cubic feet of outlet air respectively.

Baghouse operation parameters:

- (1) Plant #3=air flow=24,000; grain loading=0.0000335
- (2) Plant #5=air flow=15,000; grain loading=0.0000335
- (3) Plant #8=air flow=30,000; grain loading=0.0000335
- (4) Plant #9=air flow=7,000; grain loading=0.0000335
- (5) Plant #18=air flow=7,000; grain loading=0.0000335

The baghouses identified in (1) through (5) above are in compliance with the baghouse limitations.

326 IAC 6-1-9 (Particulate Emissions Limitations: Dubois County)

326 IAC 6-1-9 (Particulate Emissions Limitations: Dubois County) does not apply, based on non-listed units.

Plant #3:

326 IAC 6-1-2 Particulate Emission Limitations

The particulate matter (PM) from each of the machining operations in Plant #3 shall be limited to

0.03 grain per dry standard cubic foot (dscf). The baghouse shall be in operation at all times the machining operations are in operation in order to comply with this limit.

Plant #5:

326 IAC 6-1-2 Particulate Emission Limitations

The particulate matter (PM) from each of the machining operations in Plant #5 shall be limited to 0.03 grain per dry standard cubic foot (dscf). The baghouse shall be in operation at all times the machining operations are in operation in order to comply with this limit.

Plant #8:

326 IAC 2-2 PSD Minor Limit

The machining operations located in Plant #8, constructed in 1989, are not subject to the provisions of 326 IAC 2-2 based on the baghouse limitation requirement to be considered an insignificant woodworking source. Since the baghouse is limited and must be in operation at all times, the potential to emit for machining operations in Plant #8 will be less than 326 IAC 2-2 thresholds.

326 IAC 6-1-2 Particulate Emission Limitations

The particulate matter (PM) from each of the machining operations in Plant #8 shall be limited to 0.03 grain per dry standard cubic foot (dscf). The baghouse shall be in operation at all times the machining operations are in operation in order to comply with this limit.

Plant #9:

326 IAC 6-1-2 Particulate Emission Limitations

The particulate matter (PM) from each of the machining operations in Plant #9 shall be limited to 0.03 grain per dry standard cubic foot (dscf). The baghouse shall be in operation at all times the machining operations are in operation in order to comply with this limit.

Plant #18:

326 IAC 6-1-2 Particulate Emission Limitations

The particulate matter (PM) from each of the machining operations in Plant #18 shall be limited to 0.03 grain per dry standard cubic foot (dscf). The baghouse shall be in operation at all times the machining operations are in operation in order to comply with this limit.

State Rule Applicability - Surface Coating

326 IAC 2-2 (PSD Minor Limits)

326 IAC 2-2 (PSD) does not apply, because SB1-SB3 and SB4-SB7 were constructed pre-1977 and potential emissions from SB10 are less than PSD thresholds.

Plant #3:

326 IAC 6-1-2 (Particulate Matter)

The particulate matter (PM) from each of the surface coating operations located in Plant #3, shall be limited to 0.03 grains per dry standard cubic foot (dscf). Compliance is shown by the use of dry filters as control.

The dry filters shall be in operation at all times the surface coating operations located in Plant #3 are in operation, in order to comply with this limit.

326 IAC 8-2-12 Volatile Organic Compounds (VOC)

The surface coating operations located in Plant #3 are not subject to the provisions of 326 IAC 8-2-12, based on the dates of construction of the spray booths. SB10 was constructed in 1986, however, potential emissions are only 9.7 tons per year (less than the 25 tons per year applicability).

No other 8 rules apply.

326 IAC 20-14 (Wood Furniture Manufacturing Operations)

Pursuant to 326 IAC 20-14 (Wood Manufacturing Operations), the owner or operator shall comply with 40 CFR 63, Subpart JJ, which will apply to the spray booths located in Plant #3.

Plant #5:

326 IAC 2-2 PSD Minor Limit

The emissions from spray booth SB-9:

- (a) shall be limited to less than 40.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) shall be limited to less than 25.0 tons of PM and less than 15.0 tons of PM₁₀. This limit is required to limit the potential to emit of PM and PM₁₀ to less than 25 tons of PM and 15 tons of PM₁₀ per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

The dry filters shall be in operation at all times the surface coating operations located in Plant #5 are in operation, in order to comply with this limit.

326 IAC 6-1-2 (Particulate Matter)

The particulate matter (PM) from each of the surface coating operations located in Plant #5, shall be limited to 0.03 grains per dry standard cubic foot (dscf). Compliance is shown by the use of dry filters as control.

The dry filters shall be in operation at all times the surface coating operations located in Plant #5 are in operation, in order to comply with this limit.

326 IAC 8-2-12 Volatile Organic Compounds (VOC)

The surface coating operations located in Plant #5, identified as SB-1 through SB-8, are not subject to the provisions of 326 IAC 8-2-12, based on the dates of construction of the spray booths.

326 IAC 8-2-12 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating operation, identified as SB-9, shall utilize one of the following application methods:

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

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

326 IAC 20-14 (Wood Furniture Manufacturing Operations)

Pursuant to 326 IAC 20-14 (Wood Manufacturing Operations), the owner or operator shall comply with 40 CFR 63, Subpart JJ, which will apply to the spray booths located in Plant #5.

Plant #8:

326 IAC 2-2 PSD Minor Limit

The surface coating operations, identified as SB-3 through SB-5, are not subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration – PSD), based on the potential emissions less than the PSD threshold. SB1 and SB2 are not subject to these provisions because they were constructed pre-1977.

326 IAC 6-1-2 Particulate Matter

The particulate matter (PM) from each of the surface coating operations located in Plant #8, shall be limited to 0.03 grain per dry standard cubic foot (dscf).

The dry filters shall be in operation at all times the surface coating operations located in Plant #8 are in operation, in order to comply with this limit.

326 IAC 8-2-12 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets SB-3, SB-4, and SB-5 shall utilize one of the following application methods:

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

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

326 IAC 8-2-12 Volatile Organic Compounds (VOC)

The surface coating operations located in Plant #8, identified as SB-1 and SB-2, are not subject to the provisions of 326 IAC 8-2-12, based on the dates of construction of these spray booths.

No other 8 rules apply.

326 IAC 20-14 (Wood Furniture Manufacturing Operations)

Pursuant to 326 IAC 20-14 (Wood Manufacturing Operations), the owner or operator shall comply with 40 CFR 63, Subpart JJ, which will apply to the spray booths located in Plant #8.

Plant #9:

326 IAC 6-1-2 Particulate Emission Limitations

The particulate matter (PM) from each of the surface coating operations located in Plant #9 shall be limited to 0.03 grain per dry standard cubic foot (dscf).

The dry filters shall be in operation at all times the surface coating operations located in Plant #9 are in operation, in order to comply with this limit.

326 IAC 8-2-12 Volatile Organic Compounds (VOC)

The surface coating operations located in Plant #9, identified as SB-1 through SB-8, are not subject to the provisions of 326 IAC 8-2-12, based on the dates of construction of these spray booths.

No other 8 rules apply.

326 IAC 20-14 (Wood Furniture Manufacturing Operations)

Pursuant to 326 IAC 20-14 (Wood Manufacturing Operations), the owner or operator shall comply with 40 CFR 63, Subpart JJ, which will apply to the spray booths located in Plant #9.

State Rule Applicability - Boilers

Plant #3:

326 IAC 6-1-2 Particulate Matter

The 10.0 mmBtu/hr coal-fired boiler located in Plant #3, identified as B-1, is subject to 326 IAC 6-1-2. The boiler shall emit a particulate matter content of no greater than 0.6 pounds per mmBtu.

Based on potential emissions and the calculation below, the boiler is in compliance with this limit:

$$\frac{3.98 \text{ tons}}{\text{year}} \times \frac{1.0 \text{ hour}}{10\text{mmBtu}} \times \frac{1 \text{ year}}{8760 \text{ hours}} \times \frac{2000 \text{ pounds}}{1.0 \text{ ton}} = 0.09 \text{ pounds per mmBtu}$$

326 IAC 7-1.1-2 Sulfur Dioxide Rules

The 10.0 mmBtu/hr coal-fired boiler located in Plant #3, identified as B-1, is subject to 326 IAC 7-1.1-2(1). The facility shall be limited to six and zero-tenths (6.0) pounds per million for coal combustion.

Plant #5:

326 IAC 6-1-2 Particulate Rules: Particulate Emissions Limitations

The boiler or natural gas-fired drying oven shall emit a particulate matter content of no greater than 0.01 grains per dry standard cubic feet (gr/dscf).

Plant #8:

326 IAC 6-1-9 Particulate Matter: Dubois County

The particulate emissions limitations for the 6.7 mmBtu/hr coal/wood-fired boiler located in Plant #8 (formerly Huntingburg Wood Products), identified as B-2, are limited to 9.0 tons per year and 0.60 lb/mmBtu of particulate matter.

Based on potential emissions and the calculation below, the boiler is in compliance with this limit:

$$\frac{15.4 \text{ tons}}{\text{year}} \times \frac{1.0 \text{ hour}}{6.7\text{mmBtu}} \times \frac{1 \text{ year}}{8760 \text{ hours}} \times \frac{2000 \text{ pounds}}{1.0 \text{ ton}} = 0.524 \text{ pounds per mmBtu}$$

326 IAC 2-2 (PSD Minor Limit)

B-2 is not subject to the provisions of 326 IAC 2-2 (PSD) because it was constructed pre-1977.

Plant #15:

326 IAC 2-2 (PSD Minor Limit)

The coal and wood being fed to boiler B-6 shall be limited to 6,832 tons of wood per twelve (12) consecutive month period and 3,504 tons of coal per twelve (12) consecutive month period. For every ton of coal that is used, wood usage shall be decreased by 1.81 tons. This limit is required to limit the potential to emit of PM and PM₁₀ to less than 25 tons of PM and 15 tons of PM₁₀ per 12

consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 2-2 PSD Minor Limit

Pursuant to CP 037-1992, issued on June 25, 1991, the wood being fed to boiler B-3 shall be limited to 7,740 tons of wood per twelve (12) consecutive month. This limit is required to limit the potential to emit of PM and PM₁₀ to less than 25 tons of PM and 15 tons of PM₁₀ per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 6-1-2 Particulate Matter

The 12.0 mmBtu/hr coal/wood-fired boiler located in Plant #15, identified as B-6, and the 24.9 mmBtu/hr wood-fired boiler located in Plant #15, identified as B-3 are subject to 326 IAC 6-1-2. The boiler shall emit a particulate matter content of no greater than 0.6 pounds per mmBtu.

Based on potential emissions and the calculation below, the boilers are in compliance with this limit:

$$\text{B-3 } \frac{65.5 \text{ tons}}{\text{year}} \times \frac{1.0 \text{ hour}}{24.9 \text{ mmBtu}} \times \frac{1 \text{ year}}{8760 \text{ hours}} \times \frac{2000 \text{ pounds}}{1.0 \text{ ton}} = 0.600 \text{ pounds per mmBtu}$$

$$\text{B-6 } \frac{30.8 \text{ tons}}{\text{year}} \times \frac{1.0 \text{ hour}}{12.0 \text{ mmBtu}} \times \frac{1 \text{ year}}{8760 \text{ hours}} \times \frac{2000 \text{ pounds}}{1.0 \text{ ton}} = 0.586 \text{ pounds per mmBtu}$$

Plant #18:

326 IAC 6-1-2 Particulate Rules: Particulate Emissions Limitations

Boiler B-5 shall emit a particulate matter content of no greater than 0.01 grains per dry standard cubic feet (gr/dscf).

Based on potential emissions and the calculation below, the boiler is in compliance with this limit:

$$\frac{0.027 \text{ tons}}{\text{year}} \times \frac{1.0 \text{ hour}}{1.0 \text{ mmBtu}} \times \frac{1 \text{ year}}{8760 \text{ hours}} \times \frac{2000 \text{ pounds}}{1.0 \text{ ton}} = 0.0062 \text{ pounds per mmBtu}$$

State Rule Applicability - Insignificant Activities: (brazing equipment, cutting torches, soldering equipment, welding equipment)

326 IAC 6-1-2 (Particulate Matter)

The particulate matter (PM) from each of the insignificant activities, shall be limited to 0.03 grains per dry standard cubic foot (dscf). Compliance is shown by the use of dry filters as control.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D

of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (1) The baghouses used as particulate matter control for all machining operations at this source have applicable compliance monitoring conditions as specified below:

Broken or Failed Bag Detection

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

These monitoring conditions are necessary because the baghouses for the machining operations must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Emissions Limitations) and 326 IAC 2-7 (Part 70).

- (2) The dry filters used as overspray control for all surface coating operations at this source have applicable compliance monitoring conditions as specified below:

(a) Monitoring

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

- (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (3) The following conditions are applicable to all boilers located at the source:
 - (A) Visible Emissions Notations
 - (1) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere and when burning coal or wood. A trained employee shall record whether emissions are normal or abnormal.
 - (2) 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.
 - (3) 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.
 - (4) 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.
 - (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (4) The following conditions are applicable to coal/wood-fired boiler located in Plant #15, identified as B-6:
 - (a) Multi-cyclone and Flue-gas Reinjection System Inspections
An inspection shall be performed each calendar quarter of all multi-cyclones and the flue-gas reinjection system controlling the boiler. All defective equipment shall be replaced or repaired.
 - (b) Multi-Cyclone or Flue-gas Reinjection System Failure Detection
In the event that a multi-clone or flue-gas reinjection system failure has been observed:
 - (1) The affected equipment will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (5) The following conditions are applicable to wood-fired boiler located in Plant #15, identified as B-3:
 - (a) Cyclone Flyash Collector Inspections
An inspection shall be performed each calendar quarter of the cyclone flyash

collector controlling the boiler. All defective equipment shall be replaced or repaired.

(b) Cyclone Flyash Collector Failure Detection

In the event that a cyclone flyash collector failure has been observed:

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

Air Toxic Emissions

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

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A: pages 9-19)

Conclusion

The operation of this wood office furniture manufacturer shall be subject to the conditions of the attached proposed Part 70 Permit No. 037-8056-00102.