

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Woodcrest Manufacturing, Inc.
150 E. Washington Street
Peru, Indiana, 46970**

is hereby authorized to construct

a crate bed surface coating line, designated as SC3, consisting of the following equipment:

- (a) One (1) stain dip tank, identified as EU-BB, coating wood furniture with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
- (b) One (1) stain dip tank, identified as EU-X, coating wood furniture with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
- (c) One (1) stain flowcoating booth, identified as EU-02N, utilizing an air assisted airless application system, coating wood furniture with a maximum capacity of 8.13 units per hour, with dry paper filters as control for particulate matter overspray, and exhausting to Stack ID S-01.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-103-8824-00027	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
 - (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
 - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
 - (e) The Permittee has submitted their Part 70 permit on June 4, 1996, for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.
7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
2. That the Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
 - (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
 - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
 - (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
 - (a) In the event that ownership of this wood furniture manufacturing operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
 - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
 - (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:
 - (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, (local agency if applicable) or other public official having jurisdiction.

Annual Emission Reporting

7. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement 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 statement must be submitted to:

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

The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.

Opacity Limitations

8. That pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:
- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

PSD Minor Source Limit

9. That the input of volatile organic compounds (VOC) to the crate bed surface coating line SC3 (EU-02N, EU-BB, and EU-X), including coatings, dilution solvents, and cleaning solvents, shall be limited to 36 tons per twelve (12) consecutive month period, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Volatile Organic Compound (VOC) Limitations

10. That pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

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

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

Emergency Reduction Plans

11. That 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 180 calendar days from the issuance date of this permit.

(c) If the ERP is disapproved by IDEM, OAM (and local agency), the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM (and local agency), shall supply such a plan.

(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.

(g) Upon direct notification by IDEM, OAM (and local agency), 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 level. [326 IAC 1-5-3]

Wood Furniture NESHAP

12. The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

That pursuant to 40 CFR 63, Subpart JJ, Volatile Hazardous Air Pollutant (VHAP) emissions from the finishing operations shall be limited as follows:

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

A copy of this rule is enclosed.

Work Practice Standards

13. That pursuant to 40 CFR 63.803, the owner or operator of an affected source 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.

HAP Content

14. That pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Operation Condition No. 12 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

Record Keeping Requirements

15. That pursuant to 326 IAC 2-2 and 40 CFR 52.21 or 326 IAC 20-14 and 40 CFR 63.806, the following records shall be kept:
- (a) To document compliance with Operation Conditions No. 9, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Operation Condition No. 9.
 - (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 cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
 - (b) To document compliance with Operation Condition No. 12, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Operation Condition No. 12.
 - (1) Certified Product Data Sheet for each finishing material and thinner.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials.

- (3) The VHAP content in weight percent of each thinner used.
- (4) 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 Operation Condition No. 13, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Management (OAM).

Reporting Requirements

16. That pursuant to 326 IAC 2-2 and 40 CFR 52.21 or 326 IAC 20-14 and 40 CFR 63.806, the following reports are required:

- (a) A quarterly summary of the information to document compliance with Operation Condition No. 9 shall be submitted to the address listed below using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) An Initial Compliance Report to document compliance with Operation Condition No. 12 shall be submitted to the address listed below, within sixty (60) calendar days following the compliance date of December 7, 1998. The initial compliance report shall contain the information required in 40 CFR 63.804(f) to determine initial compliance and must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report and the Certification form containing the information required in 40 CFR 63.804(g) to document compliance with Operation Condition No. 12 shall be submitted to the address listed below, within thirty (30) days after the end of the six (6) months being reported.

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

- (i) December 1 through May 31.
- (ii) June 1 through November 30.
- (c) The 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
- (d) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:
 - (i) Postmarked on or before the date it is due; or
 - (ii) Delivered by any other method if it is received and stamped by IDEM, OAM (and local agency if applicable), on or before the date it is due.

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

Quarterly Report

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: CP-103-8824-00027
Facility: EU-02N, EU-BB, EU-X
Parameter: VOC Usage
Limit: 36 tons per twelve month period, rolled on a monthly basis

YEAR: _____

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage for 12 Month Period (tons)

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Woodcrest Manufacturing, Inc.
 Source Location: 150 E. Washington St., Peru, Indiana 46970
 County: Miami
 SIC Code: 2512
 Construction Permit No.: 103-8824-00027
 Permit Reviewer: Bryan Sheets

The Office of Air Management (OAM) has reviewed an application from Woodcrest Manufacturing, Inc. relating to the construction and operation of a crate bed surface coating line, designated as SC3, consisting of the following equipment:

- (a) One (1) stain dip tank, identified as EU-BB, coating wood furniture with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
- (b) One (1) stain dip tank, identified as EU-X, coating wood furniture with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
- (c) One (1) stain flowcoating booth, identified as EU-02N, utilizing an air assisted airless application system, coating wood furniture with a maximum capacity of 8.13 units per hour, with dry paper filters as control for particulate matter overspray, and exhausting to Stack ID S-01.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-01	Surface Coating	35	2	6500	70

Recommendation

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

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

An application for the purposes of this review was received on July 28, 1997.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	--	0
Particulate Matter (PM10)	--	0
Sulfur Dioxide (SO ₂)	--	0
Volatile Organic Compounds (VOC)	--	70.2
Carbon Monoxide (CO)	--	0
Nitrogen Oxides (NO _x)	--	0
Single Hazardous Air Pollutant (HAP)	--	0
Combination of HAPs	--	0

- (a) Pursuant to 326 IAC 1-2-2, the potential emissions are the allowable emissions. Therefore, the potential emissions are used for the permitting determination.
- (b) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Miami County has been classified as attainment or unclassifiable for all other regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	2.0
PM10	2.0
SO ₂	0
VOC	251.7
CO	0.1

NO _x	0.8
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- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the previous construction permit (CP-103-2222) and registration letter (CP-103-4481) issued to the source and the Part 70 permit application submitted by the company on June 4, 1996.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0	0	0	36	0	0
PSD Level	25	15	40	40	100	40

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The input VOC is limited to 36 tons/year, therefore, the PSD requirements of 326 IAC 2-2 do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-103-6056-00027) application on June 4, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 63 applicable to this facility.

40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations
This surface coating operation is covered by 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), because Woodcrest's source is a major source as defined in 40 CFR Part 63.2. The compliance date for their existing source is December 7, 1998 because actual HAP emissions for the source were less than 50 tons in 1996. Woodcrest Manufacturing is going to use a volume weighted averaging method to meet the limit of 1.0 pound of VHAP per pound of solids for their surface coating operation.

State Rule Applicability

326 IAC 2-2 (Prevention of Significant Deterioration)

Woodcrest Manufacturing has accepted a limit on the amount of VOC usage such that the PSD requirements of 326 IAC 2-2 do not apply. The company is currently using a monthly rolling limit to

show compliance with existing limits. Using this method, the limit will be 36 tons per year. The company can comply with this limit based on actual hours of operation and the coatings used.

326 IAC 2-6 (Emission Reporting)

The surface coating booths are subject to 326 IAC 2-6 (Emission Reporting), because the source has the potential to emit more than 100 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

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

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

- 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.

Air Toxic Emissions

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

- (a) None of these listed air toxics will be emitted from this proposed construction.
- (b) See attached spreadsheets for detailed air toxic calculations.

Conclusion

The construction of the surface coating booths will be subject to the conditions of the attached proposed **Construction Permit No. CP-103-8824-00027**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Woodcrest Manufacturing, Inc.
 Source Location: 150 E. Washington Street, Peru, Indiana 46970
 County: Miami
 Construction Permit No.: CP-103-8824-00027
 SIC Code: 2512
 Permit Reviewer: Bryan Sheets

On September 27, 1997, the Office of Air Management (OAM) had a notice published in the Peru Daily Tribune, Peru, Indiana, stating that Woodcrest Manufacturing, Inc. had applied for a construction permit to construct and operate two (2) dip tanks and one (1) flowcoating booth for applying stain to wood furniture. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 7, 1997, Woodcrest Manufacturing, Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

COMMENT:

Woodcrest Manufacturing, Inc. will be complying with the Wood Furniture Coating Operation NESHAP (40 CFR 63, Subpart JJ) by using coatings which all have less than or equivalent to one (1.0) pound of VHAP per pound of solids each. We are requesting that operation condition twelve (12) be amended to reflect this fact.

RESPONSE:

IDEM will modify Operation Condition No. 12 to state that compliant coatings will be used to meet the limit of one (1.0) pound of VHAP per pound of solids. The condition will be changed from:

“ The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

That pursuant to 40 CFR 63, Subpart JJ, Volatile Hazardous Air Pollutant (VHAP) emissions from the finishing operations shall be limited as follows:

- (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids.

A copy of this rule is enclosed. “

to:

“ The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

That pursuant to 40 CFR 63, Subpart JJ, Volatile Hazardous Air Pollutant (VHAP) emissions from the finishing operations shall be limited as follows:

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

A copy of this rule is enclosed. “

HAP Emission Calculations

Company Name: Woodcrest Manufacturing
Plant Location: 150 E. Washington St., Peru, Indiana
County: Miami
Permit Reviewer: Bryan Sheets
Date: 08/11/97

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Methyl Isobutyl Ketone	Weight % Methanol	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Methanol Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Unit ID EU-Q2N															
Provincial Oil Stain	6.7	0.152560	8.13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID BB															
Provincial Oil Stain	6.7	0.060345	16.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID X															
Provincial Oil Stain	6.7	0.129672	6.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

