

Mr. William Borders  
Swiss Plywood Corporation  
P.O. Box 8  
Tell City, Indiana 47586

Re: SMF 123-9297  
First Significant Modification to  
FESOP 123-6530-00007

Dear Mr. Borders:

Swiss Plywood Corporation was issued a permit on October 6, 1997 for a wood furniture and cabinet manufacturing plant. A letter requesting changes to this permit was received on February 24, 1998. Pursuant to the provisions of 326 IAC 2-8-11 a significant modification to this permit is hereby approved as described in the attached Technical Support Document.

The significant modification consists of the following changes:

- 1) The description of the surface coating operations has been revised in Section A.2 and Section D.1 to specify the types of spray guns that are used in this operation and to add a statement to the spray booth description that specifies that the baffles for overspray control shall be replaced with dry filters. Upon further review OAM has determined that the surface coating operations at this source are not subject to 326 IAC 8-2-12 because they were existing prior to 1974. Condition D.1.1 has been revised to remove this requirement from this permit. The following portions of the permit shall be revised as follows (deleted language indicated by ~~strikeout~~, new language is **bolded**):

A.2 Emission Units and Pollution Control Summary

- (a) Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with **conventional air spray guns, HVLP spray guns, and air-assisted airless** spray guns for wood furniture coating with baffles for overspray control. **Dry filters for particulate control will be replacing the baffles on the surface coating booths. Booths in which high solids type coatings are applied will have dry filters within the first six (6) months of 1998. The remainder of the booths will have dry filters no later than January 1999.**

D.1 FACILITY OPERATION CONDITIONS

Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with **conventional air spray guns, HVLP spray guns, and air-assisted airless** spray guns for wood furniture coating with baffles for overspray control. **Dry filters for particulate control will be replacing the baffles on the surface coating booths. Booths in which high solids type coatings are applied will have dry filters within the first six (6) months of 1998. The remainder of the booths will have dry filters no later than January 1999.**

D.1.1 Volatile Organic Compound

~~(a)~~ The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 8.0 tons per month. Therefore, the requirements of 326 IAC 2-7 (Part 70) will not apply.

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

D.1.3 Particulate Matter Overspray

The baffles **(or dry filters when replaced)** for particulate matter overspray shall be in operation at all times when the paint booths are in operation. The facility shall comply with 326 IAC 6-3-2(c). Use the equation  $E = 4.10P^{0.67}$ , where E is the rate of emission in pounds per hour and P is the process weight rate in tons per hour.

D.1.5 Monitoring

Daily inspections shall be performed to verify placement, integrity and particle loading of the baffles **(or dry filters when replaced)**. To document compliance with Condition D.1.3 observations shall be made daily of the overspray while at least one of the booths is in operation.

Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or any other abnormal emission is observed.

Additional inspections and preventive measures shall be performed shall be performed as prescribed in the Preventive Maintenance Plan.

- 3) OAM has determined that the weekly visible emissions observations for woodworking is sufficient for compliance monitoring. The visible emissions observations condition has been revised to change the frequency of observations from once per shift to once weekly. The following compliance monitoring condition shall be revised as follows (deleted language indicated by ~~strikeout~~, new language is **bolded**):

**D.2.5 Visible Emission Observations**

Visible emission notations of the woodworking stack exhaust shall be performed at least once ~~per shift~~ **weekly** when the woodworking process is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shutdown time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emission from that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- 4) The following compliance monitoring condition shall be deleted from the FESOP to eliminate the redundant monitoring for the woodworking operations (deleted language indicated by strikeout):

~~**D.2.7 Dust Collector Operational Parameters**~~

~~The Permittee shall take readings of the total static pressure drop across the baghouses controlling the woodworking operations at least once per day when the above stated facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of one (1) to seven (7) inches. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading. The instrument used for determining the pressure drop shall comply with Subsection C.9 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

As a result of removing Condition D.2.7 Dust Collector Operational Parameters, Condition C.9, Pressure Gauge Specifications is no longer required. The following has been deleted from the FESOP (deleted language indicated by strikeout):

~~**C.9 Pressure Gauge Specifications**~~

~~Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within  $\pm 2\%$  of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Kathy Moore, of my staff, at the above address; or by phone at 317-233-0871 or 1-800-451-6027 (ext 3-0871).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

KAM

cc: File - Perry County  
U.S. EPA, Region V  
Perry County Health Department  
Air Compliance Section Inspector - Dave Holder  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Nancy Landau

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Swiss Plywood Corporation  
102 Main Street  
Tell City, Indiana 47586**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

|   |                                       |
|---|---------------------------------------|
| Operation Permit No.: F123-6530-00007   |                                       |
| Original issued by<br>Paul Dubenetzky, Branch Chief<br>Office of Air Management | Issuance Date: October 6, 1997        |
| First Significant Permit Modification:<br>SMF123-9297                           | Pages Affected: 4, 17, 21, 22, 24, 25 |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Management         | Issuance Date:                        |

## SECTION A SOURCE SUMMARY

### A.1 General Information

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

Responsible Official: Mr. William Borders  
Source Address: 102 Main Street, Tell City, IN 47586  
Mailing Address: P.O. Box 8, Tell City, IN 47586-0008  
SIC Code: 2434, 2511, 2517 and 2599  
County Location: Perry County  
Status: Attainment for all criteria pollutants  
Source Status: Synthetic Minor Source, FESOP Program

### A.2 Emission Units and Pollution Control Summary

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

- (a) Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with conventional air spray guns, HVLP spray guns, and air-assisted airless spray guns for wood furniture coating with baffles for overspray control. Dry filters for particulate control will be replacing the baffles on the surface coating booths. Booths in which high solids type coatings are applied will have dry filters within the first six (6) months of 1998. The remainder of the booths will have dry filters no later than January 1999.
- (b) Woodworking operations with two baghouses for particulate control, identified as E22a and E22b.

### A.3 Insignificant Activities

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

- (a) Lubricating oil storage.
- (b) Filing of storage drums.
- (c) Cleaners and solvents.
- (d) Water based adhesives.
- (e) Bag and filter replacement.
- (f) Paved and unpaved roads.
- (g) Line and vessel purging.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

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

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-72(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

C.6 Compliance Monitoring [326 IAC 2-8-4(3)]

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

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

in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.7 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, as appropriate, unless some other method is specified in this permit. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326IAC 2-7-1(C)(33).

C.8 Maintenance of Monitoring Equipment [326 IAC 1-6]

The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a break down of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Preventive maintenance plans for the monitors shall be implemented. In addition, prompt correction, as indicated, shall be initiated within the time frames specified, whenever the parameters monitored fall outside of the indicated values.

C.9 This condition has been removed from the permit per Significant Modification 123-9297-00007.

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

C.10 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the prescribed time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.

## SECTION D.1 FACILITY OPERATION CONDITIONS

Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with conventional air spray guns, HVLP spray guns, and air-assisted airless spray guns for wood furniture coating with baffles for overspray control. Dry filters for particulate control will be replacing the baffles on the surface coating booths. Booths in which high solids type coatings are applied will have dry filters within the first six (6) months of 1998. The remainder of the booths will have dry filters no later than January 1999.

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

#### D.1.1 Volatile Organic Compound

The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 8.0 tons per month. Therefore, the requirements of 326 IAC 2-7 (Part 70) will not apply.

#### D.1.2 Hazardous Air Pollutants

That the hazardous air pollutant emissions shall be limited as follows:

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

Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.3 Particulate Matter Overspray

The baffles (or dry filters when replaced) for particulate matter over spray control shall be in operation at all times when the paint booths are in operation. The facility shall comply with 326 IAC 6-3-2 (c). Use the equation  $E = 4.10P^{0.67}$ , where E is the rate of emission in pounds per hour and P is the process weight rate in tons per hour.



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

#### **D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

#### **D.1.5 Monitoring**

Daily inspections shall be performed to verify placement, integrity and particle loading of the baffles (or dry filters when replaced). To document compliance with Condition D.1.3 observations shall be made daily of the overspray while at least one of the booths is in operation.

Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or any other abnormal emission is observed.

Additional inspections and preventive measures shall be performed shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.1.6 Volatile Organic Compound (VOC) Usage**

That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The VOC content (weight percent) of each coating material used;
- (c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.

#### **D.1.7 Hazardous Air Pollutant (HAP)**

That the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;

## SECTION D.2 FACILITY OPERATION CONDITIONS

Woodworking operations with two baghouses for particulate control, identified as E22a and E22b.

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

#### D.2.1 Particulate Matter

Pursuant to 326 IAC 2-8-4 (FESOP), the following conditions shall apply:

- (a) The baghouse shall be in operation at all times when the woodworking process is in operation, and shall not exceed the allowable particulate PM10 emission rate of 6.74 pounds per hour.

#### D.2.2 Particulate Matter less than ten microns

Pursuant to 326 IAC 2-8-4 (FESOP), the following conditions shall apply:

- (a) The cyclones and baghouse shall be in operation at all times when the woodworking process is in operation, and shall not exceed the allowable particulate PM10 emission rate of 6.74 pounds per hour.

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

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

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

#### D.2.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling woodworking operations. All defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.

#### D.2.5 Visible Emission Observations

Visible emission notations of the woodworking stack exhaust shall be performed at least once weekly when the woodworking process is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shutdown time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emission from that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

#### D.2.6 Broken Bag or Failure Detection

That in the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the units have been

replaced.

- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document for First Significant Permit Modification of the Federally Enforceable State Operating Permit (FESOP)

#### Source Background and Description

|                  |   |                         |
|------------------|---|-------------------------|
| Source Name:     | Swiss Plywood Corporation                 |                         |
| Source Location: | 102 Main Street, Tell City, Indiana 47586 |                         |
| County:          | Perry                                     |                         |
| Permit No.:      | F123-6530-00007                           | Issued: October 6, 1997 |
| Revision No.     | SMF123-9297                               |                         |
| SIC Code:        | 2434, 2511, 2517, 2599                    |                         |
| Permit Reviewer: | Kathy Moore                               |                         |

#### History

On February 24, 1998, a letter requesting changes to the Swiss Plywood Corporation FESOP was received by IDEM, OAM. The following changes were agreed to as the First Significant Modification for this source: revising the description of the types of spray guns used in the surface coating operation, removing a non-applicable surface coating requirement, and revising the woodworking compliance monitoring requirements to change the frequency of the compliance monitoring requirements and to eliminate redundant monitoring that was written in the FESOP. There will be no change in the emissions.

#### Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Swiss Plywood Corporation relating to the requested revisions of their FESOP and is proposing the following changes:

1. The description of the surface coating operations has been revised in Section A.2 and Section D.1 to specify the types of spray guns that are used in this operation. Upon further review OAM has determined that the surface coating operations at this source are not subject to 326 IAC 8-2-12 because they were existing prior to 1974. Condition D.1.1 has been revised to remove this requirement from this permit. The following portions of the permit shall be revised as follows (deleted language indicated by strikeout, new language is bolded):
  - A.2 Emission Units and Pollution Control Summary
    - (a) Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with **conventional air spray guns, HVLP spray guns, and air-assisted airless** spray guns for wood furniture coating with baffles for overspray control.
  - D.1 FACILITY OPERATION CONDITIONS
    - Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10,

E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with **conventional air spray guns, HVLP spray guns, and** air-assisted airless spray guns for wood furniture coating with baffles for overspray control.

D.1.1 Volatile Organic Compound

(a) The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 8.0 tons per month. Therefore, the requirements of 326 IAC 2-7 (Part 70) will not apply.

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

2. OAM has determined that the weekly visible emissions observations for woodworking is sufficient for compliance monitoring. The visible emissions observations condition has been revised to change the frequency of observations from once per shift to once weekly. The following compliance monitoring condition shall be revised as follows (deleted language indicated by strikeout, new language is bolded):

D.2.5 Visible Emission Observations

Visible emission notations of the woodworking stack exhaust shall be performed at least once ~~per shift~~ **weekly** when the woodworking process is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shutdown time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emission from that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

3. The following compliance monitoring condition shall be deleted from the FESOP to eliminate the redundant monitoring for the woodworking operations (deleted language indicated by strikeout):

~~D.2.7 Dust Collector Operational Parameters~~

~~The Permittee shall take readings of the total static pressure drop across the baghouses controlling the woodworking operations at least once per day when the above stated facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of one (1) to seven (7) inches. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading. The instrument used for determining the pressure drop shall comply with Subsection C.9 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

As a result of removing Condition D.2.7 Dust Collector Operational Parameters, Condition C.9, Pressure Gauge Specifications is no longer required. The following has been deleted from the FESOP (deleted language indicated by strikeout):

~~C.9 Pressure Gauge Specifications~~

~~Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within  $\pm 2\%$  of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.~~

**Enforcement Issue**

None

**Recommendation**

The staff recommends to the Commissioner that the First Significant Modification be approved.

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

**Emissions Calculations**

No new calculations were made for this significant modification.

**Total Potential and Allowable Emissions**

See Technical Support Document of original FESOP.

**Federal Rule Applicability**

There are no changes in Federal rule applicability from the original FESOP.

**State Rule Applicability**

Information was submitted via facsimile by Swiss Plywood Corporation on February 27, 1998 certifying that the surface coating operations at the source were constructed and have been in continuous operation since 1956. The following are the changes in State rule applicability from the original FESOP:

- (a) Upon further review OAM has determined that the surface coating operations at this source are not subject to 326 IAC 8-2-12 because they were existing prior to 1974. Condition D.1.1 has been revised to remove this requirement from this permit.

## Compliance Monitoring

OAM has determined that the weekly visible emissions observations for woodworking is sufficient for compliance monitoring. The visible emissions observations condition has been revised to change the frequency of observations from once per shift to once weekly.

Compliance monitoring requirements for woodworking operations consist of broken bag or failure detection monitoring and a choice of either quarterly baghouse inspections or parametric monitoring. The issued FESOP for Swiss Plywood Corporation contained all three of these compliance monitoring requirements. The following compliance monitoring condition shall be deleted from the FESOP to eliminate the redundant monitoring for the woodworking operations (deleted language indicated by ~~strikeout~~):

### ~~D.2.7 Dust Collector Operational Parameters~~

~~The Permittee shall take readings of the total static pressure drop across the baghouses controlling the woodworking operations at least once per day when the above stated facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of one (1) to seven (7) inches. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading. The instrument used for determining the pressure drop shall comply with Subsection C.9 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

As a result of removing Condition D.2.7 Dust Collector Operational Parameters, Condition C.9, Pressure Gauge Specifications is no longer required. The following has been deleted from the FESOP (deleted language indicated by ~~strikeout~~):

### ~~C.9 Pressure Gauge Specifications~~

~~Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within  $\pm 2\%$  of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.~~

## Air Toxic Emissions

There are no changes in the air toxic emissions due to this modification.

## Conclusion

The modifications of this source will be subject to the conditions of the attached proposed **FESOP Significant Modification Permit No. SMF-123-9297-00007.**

# Indiana Department of Environmental Management Office of Air Management

## Addendum to the Technical Support Document for the First Significant Modification to the Federally Enforceable State Operating Permit (FESOP)

Source Name: Swiss Plywood Corporation  
Source Location: 102 Main Street, Tell City, Indiana 47586  
County: Perry  
Permit No.: F123-6530-00007 Issued: October 6, 1997  
Revision No. SMF123-9297  
SIC Code: 2434, 2511, 2517, 2599  
Permit Reviewer: Kathy Moore

The Federally Enforceable State Operating Permit (FESOP) for this source was issued on October 6, 1997. A letter requesting changes to this permit was received from Swiss Plywood on February 24, 1998. On May 7, 1998, the Office of Air Management (OAM) had a notice published in the Perry County News, Tell City, Indiana, stating that Swiss Plywood Corporation had applied for a Significant Modification to its Federally Enforceable State Operating Permit (FESOP). The notice also stated that OAM proposed to issue a significant modification for this operation and provided information on how the public could review the proposed significant modification 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 significant modification should be issued as proposed.

Upon further review, IDEM and Swiss Plywood Corporation have determined that a statement should be included in the paint booth description that specifies that the baffles for overspray control will be replaced with dry filters. Also, the reference to baffles in Conditions D.1.3 and D.1.5 have been revised to clarify that when the baffles are replaced with dry filters, the dry filters will be operated at all times the booths are in operation and monitored daily. The following conditions will change as a result (new language is bolded):

### A.2 Emission Units and Pollution Control Summary

- (a) Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with conventional air spray guns, HVLP spray guns, and air-assisted airless spray guns for wood furniture coating with baffles for overspray control. **Dry filters for particulate control will be replacing the baffles on the surface coating booths. Booths in which high solids type coatings are applied will have dry filters within the first six (6) months of 1998. The remainder of the booths will have dry filters no later than January 1999.**

### D.1 FACILITY OPERATION CONDITIONS

Twenty-one (21) paint booths, identified as E1, E2, E3, E5, E6, E7, E9, E10, E11, E13, E14, E15, E17, E19, E20, E21, E23, E24, E25, E26, and E28. Each paint booth is equipped with conventional air spray guns, HVLP spray guns, and air-assisted airless spray guns for wood furniture coating with baffles for overspray control. **Dry filters for particulate control will be replacing the baffles on the surface coating booths.**



**Booths in which high solids type coatings are applied will have dry filters within the first six (6) months of 1998. The remainder of the booths will have dry filters no later than January 1999.**

D.1.3 Particulate Matter Overspray

The baffles (**or dry filters when replaced**) for particulate matter overspray shall be in operation at all times when the paint booths are in operation. The facility shall comply with 326 IAC 6-3-2(c). Use the equation  $E = 4.10P^{0.67}$ , where E is the rate of emission in pounds per hour and P is the process weight rate in tons per hour.

D.1.5 Monitoring

Daily inspections shall be performed to verify placement, integrity and particle loading of the baffles (**or dry filters when replaced**). To document compliance with Condition D.1.3 observations shall be made daily of the overspray while at least one of the booths is in operation.

Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or any other abnormal emission is observed.

Additional inspections and preventive measures shall be performed shall be performed as prescribed in the Preventive Maintenance Plan.