NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Modification to a Part 70 Operating Permit for Four Woods Laminating, Inc. in LaGrange County Significant Permit Modification No.: 087-43236-00036

The Indiana Department of Environmental Management (IDEM) has received an application from Four Woods Laminating, Inc., located at 7550 W. 500 S., Topeka, IN 46571, for a significant modification of its Part 70 Operating Permit issued on March 23, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Four Woods Laminating, Inc. to make certain changes at its existing source. Four Woods Laminating, Inc. has applied to add NESHAP subpart JJ to this permit.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

LaGrange Public Library Topeka Branch Library
133 N. Main St.
Topeka, IN 46571

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will
make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPM 087-43236-00036 in all correspondence.

Comments should be sent to:

William Altman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for William Altman or (317) 233-9664
Or dial directly: (317) 233-9664
Fax: (317) 232-6749 attn: William Altman
E-mail: WAltman@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, the IDEM Northern Regional office, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact William Altman of my staff at the above address.

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality
Maynard Yoder
Four Woods Laminating, Inc.
7550 W. CR 500 S.
Topeka, IN 46571

Re: 087-43236-00036
Significant Permit Modification

Dear Maynard Yoder:

Four Woods Laminating, Inc. was issued Part 70 Operating Permit Renewal No. T087-41516-00036 on March 23, 2020 for a stationary wood cabinet and bath door manufacturing plant located at 7550 W. 500 S., Topeka, IN 46571. An application requesting changes to this permit was received on September 9, 2020. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified, including the following new attachment(s):

Attachment D: 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing Operations

The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: 40 CFR 60, Subpart III, Stationary Compression Ignition Internal Combustion engines
Attachment B: 40 CFR 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines
Attachment C: 40 CFR 60, Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.


A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on
This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact William Altman, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-9664 or (800) 451-6027, and ask for William Altman or (317) 233-9664.

Sincerely,

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - Lagrange County
Lagrange County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office
Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Four Woods Laminating, Inc. - Plant 1
7550 W. 500 S.
Topeka, Indiana 46571

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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.

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Issued by: Original signed by:
Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch, Office of Air Quality

Issuance Date: March 23, 2020
Expiration Date: March 23, 2025

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Issued by:
Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Issuance Date: 
Expiration Date: March 23, 2025
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Attachment C: 40 CFR 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition 
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Attachment D: 40 CFR 63, Subpart JJ - National Emissions Standards for Hazardous Air Pollutants for 
Wood Furniture Manufacturing Operations
SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood cabinet and bath door manufacturing plant.

Source Address: 7550 W. 500 S., Topeka, Indiana 46571
General Source Phone Number: (260) 593-2246
SIC Code: 2499 (Wood Products, Not Elsewhere Classified)
County Location: Lagrange
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Operating Permit Program
Minor Source, under PSD Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) surface coating booth, identified as Booth 1, constructed in 1985, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(b) One (1) surface coating booth, identified as Booth 2, constructed in 1994, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 2;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(c) One (1) surface coating booth, identified as Booth 4, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 4;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(d) One (1) stain machine, identified as S11, constructed in 2012, with a maximum capacity of 945 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack S11;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(e) One (1) stain machine, identified as S1, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S1;
Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(f) One (1) stain machine, identified as S2, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S2;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(g) One (1) stain machine, identified as S3, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S3;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(h) One (1) surface coating flat line, identified as FL1, constructed in 2018, with a maximum capacity of 800 units per hour, using dry filters as control, and exhausting to stack FLSV1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(i) One (1) natural gas-fired generator, installed in 2015, manufactured in 1992, identified as NGG1, with a maximum capacity of 780 HP, using no control, and exhausting to stack NGG1; and

(j) One (1) natural gas-fired generator, installed in 2015, manufactured in 1992, identified as NGG2, with a maximum capacity of 780 HP, using no control, and exhausting to stack NGG2.

Under 40 CFR 63, Subpart ZZZZ, two (2) generators (NGG1 and NGG2) are considered existing affected units.

(k) Two (2) diesel-fired generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum capacity of 725 HP, using no control, and exhausting through stacks 7 and 8 respectively;

Under 40 CFR 60, Subpart IIII, these units are considered a new affected source. Under 40 CFR 63, Subpart ZZZZ, these units are considered a new affected source.

(l) One (1) natural gas-fired generator, installed in 2017, manufactured in 2016, identified as NGG3, with a maximum capacity of 50 HP.

Under 40 CFR 60, Subpart JJJJ, this unit is considered a new affected source. Under 40 CFR 63, Subpart ZZZZ, this unit is considered a new affected source.

A.3 Specifically Regulated Insignificant Activities

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

(a) One (1) woodworking operation, constructed in 1998, with a maximum capacity of 937 pounds of wood per hour, using two (2) integral baghouses (BH1 and BH2) for particulate control, and exhausting indoors. Woodworking equipment consist of table saws, coping, and sanding operations;
(b) Two (2) UV drying apparatuses for the stain machines, identified as UV1 and UV2, constructed in 2013 and 2016, respectively, each with a maximum capacity of 945 units per hour, powered by the one (1) natural gas-fired generator, identified as NGG2;

(c) One (1) natural gas-fired air makeup unit, identified as AMU1, constructed prior to 2010, modified in 2016, with a maximum heat input capacity of 2.33 MMBtu/hr;

(d) Two (2) natural gas-fired boilers, identified as Boiler 3 and Boiler 4, constructed in 2014, modified in 2016, with a maximum heat input capacity of 0.4 MMBtu/hr each, and operated in conjunction with the UV drying apparatuses;

(e) Two (2) natural gas-fired air make-up units, identified as AMU 2 and AMU3, constructed in 2016, each with a maximum heat input capacity of 2.916 MMBtu/hr;

(f) One (1) natural gas-fired air make-up unit, identified as AMU4, constructed in 2016, with a maximum heat input capacity of 1.5 MMBtu/hr;

(g) One (1) natural gas-fired boiler, identified as Boiler 5, constructed in 2016, with a maximum heat input capacity of 0.266 MMBtu/hr;

(h) One (1) natural gas-fired boiler, identified as Boiler 6, constructed in 2016, with a maximum heat input capacity of 0.164 MMBtu/hr;

(i) One (1) natural gas-fired furnace, identified as Furnace 1, constructed in 2016, with a maximum heat input capacity of 0.055 MMBtu/hr;

(j) One (1) natural gas-fired drying oven for the surface coating flat line FL1, identified as Oven 5, constructed in 2018, with a maximum heat input capacity of 0.16 MMBtu/hr, uncontrolled, and exhausting to stack OS5;

(k) One (1) UV drying apparatus for the surface coating flat line FL1, identified as UV3, constructed in 2018, with a maximum capacity of 800 units per hour, uncontrolled, exhausting to stack UVS3, and powered by the one (1) natural gas-fired generator, identified as NGG2;

(l) Four (4) natural gas-fired drying ovens, identified as Oven 1 through Oven 4, constructed in 2014, with a maximum heat input capacity of 0.16 MMBtu/hr, each, uncontrolled, and exhausting to stacks OS1 through OS4;

(m) One (1) natural gas-fired boiler, identified as Boiler 7, constructed in 2017, with a maximum heat input capacity of 0.4 MMBtu/hr; and

(n) Paved and unpaved roads.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B GENERAL CONDITIONS

B.1 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T087-41516-00036, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, 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.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 Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
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, OAQ 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 the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.
(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, OAQ, or Northern Regional Office 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 Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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 and Enforcement Branch, Office of Air Quality
   100 North Senate Avenue
   MC 61-53 IGCN 1003
   Indianapolis, Indiana 46204-2251

   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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ 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) 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.

B.12 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) 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, OAQ 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.

(c) 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.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T087-41516-00036 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.
(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 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.15 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 Operating 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ 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, OAQ 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, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ 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(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:
A timely renewal application is one that is:

1. Submitted at least nine (9) months prior to the date of the expiration of this permit; and
2. 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, OAQ on or before the date it is due.

(c) 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, OAQ 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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and modifications are governed by 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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)]

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 or notice 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) 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.19 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) or (c) 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 limitations provided in 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(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(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and
(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at 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, OAQ 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.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
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, OAQ, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
B.22 Transfer of Ownership or Operational Control [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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply 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 5-1-1 (Applicability) and 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.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.
Testing Requirements  [326 IAC 2-7-6(1)]

C.7 Performance Testing  [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements  [326 IAC 2-1.1-11]

C.8 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 by issuing an order under 326 IAC 2-1.1-11. 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.9 Compliance Monitoring  [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.11 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ 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.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;
(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 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 submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

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

C.15 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]

Pursuant to 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.
The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
(b) The address for report submittal is:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

(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, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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 applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a)  One (1) surface coating booth, identified as Booth 1, constructed in 1985, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 1;

(b)  One (1) surface coating booth, identified as Booth 2, constructed in 1994, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 2;

(c)  One (1) surface coating booth, identified as Booth 4, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 4;

(d)  One (1) stain machine, identified as S11, constructed in 2012, with a maximum capacity of 945 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack S11;

(e)  One (1) stain machine, identified as S1, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S1;

(f)  One (1) stain machine, identified as S2, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S2;

(g)  One (1) stain machine, identified as S3, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S3;

(h)  One (1) surface coating flat line, identified as FL1, constructed in 2018, with a maximum capacity of 800 units per hour, using dry filters as control, and exhausting to stack FLSV1;

(i)  One (1) natural gas-fired generator, installed in 2015, manufactured in 1992, identified as NGG1, with a maximum capacity of 780 HP, using no control, and exhausting to stack NGG1; and

(j)  One (1) natural gas-fired generator, installed in 2015, manufactured in 1992, identified as NGG2, with a maximum capacity of 780 HP, using no control, and exhausting to stack NGG2.

Under 40 CFR 63, Subpart ZZZZ, two (2) generators (NGG1 and NGG2) are considered existing affected units.

(k)  Two (2) diesel-fired generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum capacity of 725 HP, using no control, and exhausting through stacks 7 and 8 respectively;

Under 40 CFR 60, Subpart IIII, these units are considered a new affected source.

Under 40 CFR 63, Subpart ZZZZ, these units are considered a new affected source.
Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Source Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The total input of VOC, including coatings, dilution solvents, and cleaning solvents, delivered to the coating applicators at the three (3) surface coating booths (Booth 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1) shall not exceed 233 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input;

(b) The total NOx emissions from two (2) natural gas-fired generators (NGG1 and NGG2) and two (2) diesel-fired generators (Engine 1 and Engine 2) shall not exceed 237 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the unrestricted potential to emit VOC and NOx from all other emission units at the source, including insignificant activities, shall limit VOC and NOx emissions from the entire source to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12][326 IAC 8-1-6]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in Booths 2 and 4, Stain Machines S11, S1, S2, and S3, and surface coating line FL1, and pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and F087-8992-00036, issued on January 12, 1999, in Booth 1, the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) of the following application methods:

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

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

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) surface coating booths, four (4) stain machines, and surface coating flat line FL1 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC input limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC and HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit 087-40306-00036.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC input limitations contained in Condition D.1.1 (a) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

\[ \text{VOC input} = \text{SCL} - \text{SR} \]

Where:

\[ \text{SCL} = \text{The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and} \]

\[ \text{SR} = \text{The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.} \]

D.1.6 NOx Emission Determination

Compliance with Condition D.1.1(b) shall be determined by calculating the NOx emissions associated with the two (2) natural gas-fired generators (NGG1 and NGG2) and two (2) diesel-fired generators (Engine 1 and Engine 2) as follows:

The NOx emissions shall be determined by the following equation:

\[ \text{NOx emissions} = \frac{[\text{Ef1} \times (Y_1 + Y_2) \times 1 \text{ ton}]}{2,000 \text{lbs}} + \frac{[\text{Ef2} \times (Y_3 + Y_4) \times 1 \text{ ton}]}{2,000 \text{lbs}} \]

Where:

\[ \text{Ef1} = 17.4 \text{ lb/hr}, \text{ NOx emissions for diesel-fired generators} \]
\[ \text{Ef2} = 4161.6 \text{ lb/MMCF}, \text{ NOx emissions for natural gas-fired generators} \]
\[ Y_1 = \text{No. of hours of operation per month for Engine 1, hrs/month} \]
\[ Y_2 = \text{No. of hours of operation per month for Engine 2, hrs/month} \]
\[ Y_3 = \text{Million cubic feet of natural gas used per month in NGG1, MMCF/month} \]
\[ Y_4 = \text{Million cubic feet of natural gas used per month in NGG2, MMCF/month} \]
D.1.7 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 stacks exhausting from Booths 1, 2, and 4, Stain Machines S11, S1, S2, and S3, and surface coating flat line FL1 while one or more of the units are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 (a), 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 input limits established in Conditions D.1.1(a), and to document the quantity of any VOC shipped offsite and deducted from the total reported VOC usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

1. The VOC content of each coating material and solvent used.

2. The amount of coating material and solvent less water used on monthly basis.

   (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

   (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

3. The cleanup solvent usage for each month.

4. If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (a) of Condition D.1.1, then the following records shall be maintained:

   (A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
(B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.

(C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.

(5) The total VOC input for each month.

(6) The total VOC input for each compliance period.

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections;

(c) To document the compliance status with Conditions D.1.1 (b), the Permittee shall maintain monthly records of the hours of operation for Engines 1 and 2, and the total NOx emissions from NGG1, NGG2, Engine 1 and Engine 2; and

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1 (a) (b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 3826 IAC 2-7-1(35).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) One (1) woodworking operation, constructed in 1998, with a maximum capacity of 937 pounds of wood per hour, using two (2) integral baghouses (BH1 and BH2) for particulate control, and exhausting indoors. Woodworking equipment consist of table saws, coping, and sanding operations.

(The information describing the process contained in this emissions unit 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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 2.47 pounds per hour based on a process weight rate of 0.4685 tons per hour. The pound per hour limitation was based on the following equation:

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of allowable emissions in pounds per hour; and \( P \) = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.3 Particulate Control [326 IAC 2-2][326 IAC 2-7-1(21)(J)(xxx)(DD)][326 IAC 6-3-2][326 IAC 2-7-6(6)]

(a) In order to assure that requirements of 326 IAC 2-2 (PSD) do not apply and to comply with Conditions D.2.1, the integral baghouses BH1 and BH2 for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is in operation.

Compliance with this condition, combined with the potential to emit particulate emissions from all other emission units at the source, shall assure the particulate emissions from the entire source are less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.4 Visible Emissions Notations [326 IAC 2-7-1(21)(J)(xxx)]

Pursuant to 326 IAC 2-7-1(21)(J)(xxx), the Permittee shall comply with the following:

(a) Visible emission notations of the baghouses BH1 and BH2 exhausts shall be performed once per day during normal daylight operations when venting 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) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the aggregate dryer/burner. 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).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

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

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of baghouses BH1 and BH2 exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the woodworking operation did not operate that day).
(b) The Permittee shall maintain records of corrective actions to document the compliance status with 326 IAC 2-7-1(21)(J)(xxx)(GG)(dd).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

**Insignificant Activities**

(d) Two (2) natural gas-fired boilers, identified as Boiler 3 and Boiler 4, constructed in 2014, modified in 2016, with a maximum heat input capacity of 0.4 MMBtu/hr each, and operated in conjunction with the UV drying apparatuses;

(g) One (1) natural gas-fired boiler, identified as Boiler 5, constructed in 2016, with a maximum heat input capacity of 0.266 MMBtu/hr;

(h) One (1) natural gas-fired boiler, identified as Boiler 6, constructed in 2016, with a maximum heat input capacity of 0.164 MMBtu/hr;

(j) One (1) natural gas-fired drying oven for the surface coating flat line FL1, identified as Oven 5, constructed in 2018, with a maximum heat input capacity of 0.16 MMBtu/hr, uncontrolled, and exhausting to stack OS5;

(l) Four (4) natural gas-fired drying ovens, identified as Oven 1 through Oven 4, constructed in 2014, with a maximum heat input capacity of 0.16 MMBtu/hr, each, uncontrolled, and exhausting to stacks OS1 through OS4; and

(m) One (1) natural gas-fired boiler, identified as Boiler 7, constructed in 2017, with a maximum heat input capacity of 0.4 MMBtu/hr.

(The information describing the process contained in this emissions unit 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 Limitations [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the natural gas-fired boilers, Boiler 3 through Boiler 7, and the natural gas-fired drying ovens, Oven 1 through Oven 5, shall be limited to 0.6 pounds per million Btu heat input (lb/MMBtu), each.

D.3.2  Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION E.1

NSPS

Emissions Unit Description:

(k) Two (2) diesel-fired generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum capacity of 725 HP, using no control, and exhausting through stacks 7 and 8 respectively;

Under 40 CFR 60, Subpart IIII, these units are considered a new affected source.
Under 40 CFR 63, Subpart ZZZZ, these units are considered a new affected source.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart IIII.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 Standards of Performance for Stationary Compression Ignition Internal Combustion Engines NSPS [326 IAC 12] [40 CFR Part 60, Subpart IIII]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.4200(a)(2)(i)
(2) 40 CFR 60.4204(b)
(3) 40 CFR 60.4206
(4) 40 CFR 60.4207(b)
(5) 40 CFR 60.4208
(6) 40 CFR 60.4211(c)
(7) 40 CFR 60.4212(a)
(8) 40 CFR 60.4218
(9) 40 CFR 60.4219
(10) Table 8
SECTION E.2 NSPS

Emissions Unit Description:

(l) One (1) natural gas-fired generator, identified as NGG3, installed in 2017, manufactured in 2016, with a maximum capacity of 50 HP.

Under 40 CFR 60, Subpart JJJJ, this unit is considered a new affected source.
Under 40 CFR 63, Subpart ZZZZ, this unit is considered a new affected source.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 Standards of Performance for Stationary Spark Ignition Internal Combustion Engines NSPS [326 IAC 12] [40 CFR Part 60, Subpart JJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.4230(a)(4)(iii) and (c)
(2) 40 CFR 60.4233(d)
(3) 40 CFR 60.4234
(4) 40 CFR 60.4236 (e)
(5) 40 CFR 60.4243(a), (b), (e), (f)
(6) 40 CFR 60.4245(a)
(7) 40 CFR 60.4246
(8) 40 CFR 60.4248
(9) Table 1
(10) Table 3

E.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION E.3  
NESHAP

Emissions Unit Description:

(i) One (1) natural gas-fired generator, installed in 2015, manufactured in 1992, identified as NGG1, with a maximum capacity of 780 HP, using no control, and exhausting to stack NGG1; and

(ii) One (1) natural gas-fired generator, installed in 2015, manufactured in 1992, identified as NGG2, with a maximum capacity of 780 HP, using no control, and exhausting to stack NGG2.

Under 40 CFR 63, Subpart ZZZZ, two (2) generators (NGG1 and NGG2) are considered an existing affected units.

(k) Two (2) diesel-fired generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum capacity of 725 HP, using no control, and exhausting through stacks 7 and 8 respectively;

Under 40 CFR 60, Subpart IIII, these units are considered a new affected source.
Under 40 CFR 63, Subpart ZZZZ, these units are considered a new affected source.

(l) One (1) natural gas-fired generator, identified as NGG3, installed in 2017, manufactured in 2016, with a maximum capacity of 50 HP.

Under 40 CFR 60, Subpart JJJJ, this unit is considered a new affected source.
Under 40 CFR 63, Subpart ZZZZ, this unit is considered a new affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
E.3.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, NESHAP [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-82,

(a) Two (2) diesel-fired generators (Engine 1 and Engine 2):

1. 40 CFR 63.6580
2. 40 CFR 63.6585
3. 40 CFR 63.6590(a)(2)(iii) and (c)(1)
4. 40 CFR 63.6595(a)(7)
5. 40 CFR 63.6665
6. 40 CFR 63.6670
7. 40 CFR 63.6675

(b) Two (2) natural gas-fired generators (NGG1 and NGG2):

1. 40 CFR 63.6580
2. 40 CFR 63.6585
3. 40 CFR 63.6590(a)(1)(iii) and (iv)
4. 40 CFR 63.6595(a)(1), (b), and (c)
5. 40 CFR 63.6603(a) and (f)
6. 40 CFR 63.6605
7. 40 CFR 63.6612
8. 40 CFR 63.6620(a), (d), (e), (f), (g), (h), and (i)
9. 40 CFR 63.6625 (e)(9), (h), (j)
10. 40 CFR 63.6630 (a), (b), and (c) and (e)
11. 40 CFR 63.6635
12. 40 CFR 63.6640(a), (b), (c) and (e)
13. 40 CFR 63.6645 (a)(2), (g), and (h)
14. 40 CFR 63.6650
15. 40 CFR 63.6655
16. 40 CFR 63.6660
17. 40 CFR 63.6665
18. 40 CFR 63.6670
19. 40 CFR 63.6675
20. Table 2d (items 5, 8 and 9
21. Table 4
22. Table 5 (item 13)
23. Table 6 (items 9, 14 and 15)
24. Table 7 (item 3)
25. Table 8
26. Appendix A

(c) One (1) natural gas-fired generator (NGG3)

1. 40 CFR 63.6580
2. 40 CFR 63.6585
3. 40 CFR 63.6590(a)(2)(iii) and (c)(1)
4. 40 CFR 63.6595(a)(7)
5. 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675
### SECTION E.4 NESHAP

**Emissions Unit Description:**

(a) One (1) surface coating booth, identified as Booth 1, constructed in 1985, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(b) One (1) surface coating booth, identified as Booth 2, constructed in 1994, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 2;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(c) One (1) surface coating booth, identified as Booth 4, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 4;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(d) One (1) stain machine, identified as S11, constructed in 2012, with a maximum capacity of 945 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack S11;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(e) One (1) stain machine, identified as S1, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(f) One (1) stain machine, identified as S2, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S2;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(g) One (1) stain machine, identified as S3, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S3;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(h) One (1) surface coating flat line, identified as FL1, constructed in 2018, with a maximum capacity of 800 units per hour, using dry filters as control, and exhausting to stack FLSV1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251


The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment B to the operating permit). which are incorporated by reference as 326 IAC 20-14, for the emission units listed above:

(1) 40 CFR 63.800 (a), (c)-(e), (h)
(2) 40 CFR 63.801
(3) 40 CFR 63.802 (b), (c)
(4) 40 CFR 63.803
(5) 40 CFR 63.804 (d), (e), (f), (g)
(6) 40 CFR 63.805 (a)
(7) 40 CFR 63.806 (a)-(c), (e), (h)-(k)
(8) 40 CFR 63.807 (a)-(c), (e)
(9) 40 CFR 63.808
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Four Woods Laminating, Inc. - Plant 1
Source Address: 7550 W. 500 S., Topeka, Indiana 46571
Part 70 Permit No.: T087-41516-00036

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:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)
☐ Report (specify)
☐ Notification (specify)
☐ Affidavit (specify)
☐ 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:
Phone:
Date:
This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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

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<th>Date/Time Emergency started:</th>
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<td>Date/Time Emergency was corrected:</td>
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<td>Was the facility being properly operated at the time of the emergency?</td>
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<td>Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOx, CO, Pb, other:</td>
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<td>Estimated amount of pollutant(s) emitted during emergency:</td>
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<td>Describe the steps taken to mitigate the problem:</td>
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<td>Describe the corrective actions/response steps taken:</td>
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<td>Describe the measures taken to minimize emissions:</td>
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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: __________________________
Four Woods Laminating, Inc. - Plant 1

Source Name: Four Woods Laminating, Inc. - Plant 1
Source Address: 7550 W. 500 S., Topeka, Indiana 46571
Part 70 Permit No.: T087-41516-00036
Facility: Three (3) surface coating booths (Booths 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1)
Parameter: Total VOC Input
Limit: Total input of VOC, including coatings, dilution solvents, and cleaning solvents, delivered to the coating applicators at the three (3) surface coating booths (Booth 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1) shall not exceed 233 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input

QUARTER: ____________________ YEAR: ____________________

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☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: ______________________
Title / Position: ______________________
Signature: ______________________
Date: ______________________
Phone: ______________________
**Part 70 Quarterly Report**

Source Name: Four Woods Laminating, Inc. - Plant 1  
Source Address: 7550 W. 500 S., Topeka, Indiana 46571  
Part 70 Permit No.: T087-41516-00036  
Facility: Two (2) natural gas-fired generators (NGG1 and NGG2) and two (2) diesel-fired generators (Engine 1 and Engine 2)  
Parameter: NOx emissions  
Limit: The total NOx emissions from two (2) natural gas-fired generators (NGG1 and NGG2) and two (2) diesel-fired generators (Engine 1 and Engine 2) shall not exceed 237 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

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- □ No deviation occurred in this quarter.
- □ 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 QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Four Woods Laminating, Inc. - Plant 1
Source Address: 7550 W. 500 S., Topeka, Indiana 46571
Part 70 Permit No.: T087-41516-00036

Months: __________ to __________ Year: __________

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".

**NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

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PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations

§ 63.800 Applicability.

(a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, § 63.2. The owner or operator of a source that meets the definition for an incidental wood furniture manufacturer shall maintain purchase or usage records demonstrating that the source meets the definition in § 63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.

(b) A source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to any other provision of this rule, provided that: In the case of paragraphs (b)(1) and (b)(2), finishing materials, adhesives, cleaning solvents and washoff solvents used for wood furniture or wood furniture component manufacturing operations account for at least 90 percent of annual HAP emissions at the plant site, and if the plant site has HAP emissions that do not originate from the listed materials, the owner or operator shall keep any records necessary to demonstrate that the 90 percent criterion is being met. A source that initially relies on the limits and criteria specified in paragraphs (b)(1), (b)(2), and (b)(3) to become an area source, but subsequently exceeds the relevant limit (without first obtaining and complying with other limits that keep its potential to emit hazardous air pollutants below major source levels), becomes a major source and must comply thereafter with all applicable provisions of this subpart starting on the applicable compliance date in § 63.800. Nothing in this paragraph (b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

(1) The owner or operator of the source uses no more than 250 gallons per month, for every month, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). The owner or operator shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month, and upon request submit such records to the Administrator. These records shall be maintained for five years.

(2) The owner or operator of the source uses no more than 3,000 gallons per rolling 12-month period, for every 12-month period, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). A rolling 12-month period includes the previous 12 months of operation. The owner or operator of the source shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month and the total gallons used each previous month, and upon request submit such records to the Administrator. Because records are needed over the
previous set of 12 months, the owner or operator shall keep monthly records beginning no less than one year before
the compliance date specified in § 63.800(e). Records shall be maintained for five years.

(3) The source emits no more than 4.5 Mg (5 tons) of any one HAP per rolling 12-month period and no more than
11.4 Mg (12.5 tons) of any combination of HAP per rolling 12-month period, and at least 90 percent of the plantwide
emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture
components.

c) This subpart does not apply to research or laboratory facilities as defined in § 63.801.

d) This subpart does not apply to any surface coating or coating operation that meets any of the criteria of
paragraphs (d)(1) through (4) of this section.

(1) Surface coating of metal parts and products other than metal components of wood furniture that meets the
applicability criteria for miscellaneous metal parts and products surface coating (subpart MMMM of this part).

(2) Surface coating of plastic parts and products other than plastic components of wood furniture that meets the
applicability criteria for plastic parts and products surface coating (subpart PPPP of this part).

(3) Surface coating of wood building products that meets the applicability criteria for wood building products surface
coating (subpart QQQQ of this part). The surface coating of millwork and trim associated with cabinet manufacturing
are subject to subpart JJ.

(4) Surface coating of metal furniture that meets the applicability criteria for metal furniture surface coating (subpart
RRRR of this part). Surface coating of metal components of wood furniture performed at a wood furniture or wood
furniture component manufacturing facility are subject to subpart JJ.

e) Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General
Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.

(f) The compliance date for existing affected sources that emit less than 50 tons per year of HAP in 1996 is
December 7, 1998. The compliance date for existing affected sources that emit 50 tons or more of hazardous air
pollutants in 1996 is November 21, 1997. The owner or operator of an existing area source that increases its
emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart
shall comply with this subpart one year after becoming a major source.

(g) Existing affected sources shall be in compliance with § 63.802(a)(4) and § 63.803(h) no later than November 21,
2014. The owner or operator of an existing area source that increases its emissions of (or its potential to emit)
hazardous air pollutants (HAP) such that the source becomes a major source that is subject to this subpart shall
comply with this subpart 1 year after becoming a major source.

(h) New affected sources must comply with the provisions of this standard immediately upon startup or by December
7, 1995, whichever is later. New area sources that become major sources shall comply with the provisions of this
standard immediately upon becoming a major source.

(i) Reconstructed affected sources are subject to the requirements for new affected sources. The costs associated
with the purchase and installation of air pollution control equipment (e.g., incinerators, carbon adsorbers, etc.) are not
considered in determining whether the facility has been reconstructed, unless the control equipment is required as
part of the process (e.g., product recovery). Additionally, the costs of retrofitting and replacement of equipment that is
installed specifically to comply with this subpart are not considered reconstruction costs. For example, an affected
source may convert to waterborne coatings to meet the requirements of this subpart. At most facilities, this
conversion will require the replacement of existing storage tanks, mix equipment, and transfer lines. The cost of
replacing the equipment is not considered in determining whether the facility has been reconstructed.

(j) If the owner or operator, in accordance with 40 CFR 63.804, uses a control system as a means of limiting
emissions, in response to an action to enforce the standards set forth in this subpart, you may assert an affirmative
defense to a claim for civil penalties for exceedances of such standards that are caused by malfunction, as defined in
40 CFR 63.2. Appropriate penalties may be assessed, however, if the respondent fails to meet its burden of proving
all the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

(1) To establish the affirmative defense in any action to enforce such a limit, the owner or operator must timely meet the notification requirements in paragraph (j)(2) of this section, and must prove by a preponderance of evidence that:

(i) The excess emissions:

(A) Were caused by a sudden, infrequent, and unavoidable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner; and

(B) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and

(C) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(D) Were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(ii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and

(iii) The frequency, amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions; and

(iv) If the excess emissions resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and

(v) All possible steps were taken to minimize the impact of the excess emissions on ambient air quality, the environment, and human health; and

(vi) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and

(vii) All of the actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs; and

(viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions; and

(ix) A written root cause analysis has been prepared, the purpose of which is to determine, correct and eliminate the primary causes of the malfunction and the excess emissions resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of excess emissions that were the result of the malfunction.

(2) Notification. The owner or operator of the facility experiencing an exceedance of its emission limit(s) during a malfunction shall notify the Administrator by telephone or facsimile (FAX) transmission as soon as possible, but no later than 2 business days after the initial occurrence of the malfunction, if it wishes to avail itself of an affirmative defense to civil penalties for that malfunction. The owner or operator seeking to assert an affirmative defense shall also submit a written report to the Administrator within 45 days of the initial occurrence of the exceedance of the standard in this subpart to demonstrate, with all necessary supporting documentation, that it has met the requirements set forth in paragraph (h)(1) of this section. The owner or operator may seek an extension of this deadline for up to 30 additional days by submitting a written request to the Administrator before the expiration of the 45 day period. Until a request for an extension has been approved by the Administrator, the owner or operator is subject to the requirement to submit such report within 45 days of the initial occurrence of the exceedance.

§ 63.801 Definitions.

(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A (General Provisions) of this part.

Adhesive means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. Under this subpart, adhesives shall not be considered coatings or finishing materials. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Administrator means the Administrator of the United States Environmental Protection Agency or his or her authorized representative.

Aerosol adhesive means an adhesive that is dispensed from a pressurized container as a suspension of fine solid or liquid particles in gas.

Affected source means a wood furniture manufacturing facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2, excluding sources that meet the criteria established in § 63.800(a), (b) and (c) of this subpart.

Affirmative defense means, in the context of an enforcement proceeding, a response or defense put forward by a defendant, regarding which the defendant has the burden of proof and the merits of which are independently and objectively evaluated in a judicial or administrative proceeding.

Alternative method means any method of sampling and analyzing for an air pollutant that is not a reference or equivalent method but has been demonstrated to the Administrator's satisfaction to, in specific cases, produce results adequate for a determination of compliance.

As applied means the HAP and solids content of the coating or contact adhesive that is actually used for coating or gluing the substrate. It includes the contribution of materials used for in-house dilution of the coating or contact adhesive.

Basecoat means a coat of colored material, usually opaque, that is applied before graining inks, glazing coats, or other opaque finishing materials, and is usually topcoated for protection.

Baseline conditions means the conditions that exist prior to an affected source implementing controls, such as a control system.

Building enclosure means a building housing a process that meets the requirements of a temporary total enclosure. The EPA Method 204E is used to identify all emission points from the building enclosure and to determine which emission points must be tested. For additional information see Guidelines for Determining Capture Efficiency, January 1994. Docket No. A-93-10, Item No. IV-B-1.

Capture device means a hood, enclosed room, floor sweep, or other means of collecting solvent emissions or other pollutants into a duct so that the pollutant can be directed to a pollution control device such as an incinerator or carbon adsorber.

Capture efficiency means the fraction of all organic vapors generated by a process that are directed to a control device.

Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

(1) The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311 (as promulgated in this subpart), or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in § 63.805(a)).
(2) The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in § 63.805 (a)); and

(3) The density, measured by EPA Method 24 or an alternative or equivalent method. Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the affected source in demonstrating compliance with the emission limitations presented in § 63.802.

**NOTE:** Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.)

**Cleaning operations** means operations in which organic HAP solvent is used to remove coating materials or adhesives from equipment used in wood furniture manufacturing operations.

**Coating** means a protective, decorative, or functional film applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, enamels, inks, and temporary protective coatings. Aerosol spray paints used for touch-up and repair are not considered coatings under this subpart.

**Coating application station** means the part of a coating operation where the coating is applied, e.g., a spray booth.

**Coating operation** means those activities in which a coating is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

**Coating solids (or solids)** means the part of the coating which remains after the coating is dried or cured; solids content is determined using data from the EPA Method 24, or an equivalent or alternative method.

**Compliant coating/contact adhesive** means a finishing material, contact adhesive, or strippable booth coating that meets the emission limits specified in Table 3 of this subpart.

**Contact adhesive** means an adhesive that is applied to two substrates, dried, and mated under only enough pressure to result in good contact. The bond is immediate and sufficiently strong to hold pieces together without further clamping, pressure, or airing.

**Continuous coater** means a finishing system that continuously applies finishing materials onto furniture parts moving along a conveyor. Finishing materials that are not transferred to the part are recycled to a reservoir. Several types of application methods can be used with a continuous coater including spraying, curtain coating, roll coating, dip coating, and flow coating.

**Continuous compliance** means that the affected source is meeting the emission limitations and other requirements of the rule at all times and is fulfilling all monitoring and recordkeeping provisions of the rule in order to demonstrate compliance.

**Control device** means any equipment that reduces the quantity of a pollutant that is emitted to the air. The device may destroy or secure the pollutant for subsequent recovery. Includes, but is not limited to, incinerators, carbon adsorbers, and condensers.

**Control device efficiency** means the ratio of the pollutant released by a control device and the pollutant introduced to the control device.

**Control system** means the combination of capture and control devices used to reduce emissions to the atmosphere.
Conventional air spray means a spray coating method in which the coating is atomized by mixing it with compressed air and applied at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization. Airless and air assisted airless spray technologies are not conventional air spray because the coating is not atomized by mixing it with compressed air. Electrostatic spray technology is also not considered conventional air spray because an electrostatic charge is employed to attract the coating to the workpiece.

Data quality objective (DQO) approach means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Day means a period of 24 consecutive hours beginning at midnight local time, or beginning at a time consistent with a facility's operating schedule.

Disposed offsite means sending used organic HAP solvent or coatings outside of the facility boundaries for disposal.

Emission means the release or discharge, whether directly or indirectly, of HAP into the ambient air.

Enamel means a coat of colored material, usually opaque, that is applied as a protective topcoat over a basecoat, primer, or previously applied enamel coats. In some cases, another finishing material may be applied as a topcoat over the enamel.

Equipment leak means emissions of VHAP from pumps, valves, flanges, or other equipment used to transfer or apply coatings, adhesives, or organic HAP solvents.

Equivalent method means any method of sampling and analyzing for an air pollutant that has been demonstrated to the Administrator's satisfaction to have a consistent and quantitatively known relationship to the reference method, under specific conditions.

Finishing material means a coating used in the wood furniture industry. Such materials include, but are not limited to, stains, basecoats, washcoats, enamels, sealers, and topcoats.

Finishing operation means those operations in which a finishing material is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

Foam adhesive means a contact adhesive used for gluing foam to fabric, foam to foam, and fabric to wood.

Gluing operation means those operations in which adhesives are used to join components, for example, to apply a laminate to a wood substrate or foam to fabric.

Incidental wood furniture manufacturer means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components.

Incinerator means, for the purposes of this industry, an enclosed combustion device that thermally oxidizes volatile organic compounds to CO and CO₂. This term does not include devices that burn municipal or hazardous waste material.

Janitorial maintenance means the upkeep of equipment or building structures that is not directly related to the manufacturing process, for example, cleaning of restroom facilities.

Low-formaldehyde means, in the context of a coating or contact adhesive, a product concentration of less than or equal to 1.0 percent formaldehyde by weight, as described in a certified product data sheet for the material.

Lower confidence limit (LCL) approach means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).
Material safety data sheet (MSDS) means the documentation required for hazardous chemicals by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR part 1910) for a solvent, cleaning material, contact adhesive, coating, or other material that identifies select reportable hazardous ingredients of the material, safety and health considerations, and handling procedures.

Noncompliant coating/contact adhesive means a finishing material, contact adhesive, or strippable booth coating that has a VHAP content (VOC content for the strippable booth coating) greater than the emission limitation presented in Table 3 of this subpart.

Nonporous substrate means a surface that is impermeable to liquids. Examples include metal, rigid plastic, flexible vinyl, and rubber.

Normally closed container means a container that is closed unless an operator is actively engaged in activities such as emptying or filling the container.

Operating parameter value means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limit.

Organic HAP solvent means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film.

Overall control efficiency means the efficiency of a control system, calculated as the product of the capture and control device efficiencies, expressed as a percentage.

Permanent total enclosure means a permanently installed enclosure that completely surrounds a source of emissions such that all emissions are captured and contained for discharge through a control device. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Recycled onsite means the reuse of an organic HAP solvent in a process other than cleaning or washoff.

Reference method means any method of sampling and analyzing for an air pollutant that is published in appendix A of 40 CFR part 60.

Research or laboratory facility means any stationary source whose primary purpose is to conduct research and development to develop new processes and products where such source is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Responsible official has the meaning given to it in 40 CFR part 70, State Operating Permit Programs (Title V permits).

Sealer means a finishing material used to seal the pores of a wood substrate before additional coats of finishing material are applied. Special purpose finishing materials that are used in some finishing systems to optimize aesthetics are not sealers.

Solvent means a liquid used in a coating or contact adhesive to dissolve or disperse constituents and/or to adjust viscosity. It evaporates during drying and does not become a part of the dried film.

Stain means any color coat having a solids content by weight of no more than 8.0 percent that is applied in single or multiple coats directly to the substrate. It includes, but is not limited to, nongrain raising stains, equalizer stains, prestains, sap stains, body stains, no-wipe stains, penetrating stains, and toners.

Storage containers means vessels or tanks, including mix equipment, used to hold finishing, gluing, cleaning, or washoff materials.
Strippable spray booth material means a coating that:

(1) Is applied to a spray booth wall to provide a protective film to receive over spray during finishing operations;

(2) That is subsequently peeled off and disposed; and

(3) By achieving (1) and (2) of this definition reduces or eliminates the need to use organic HAP solvents to clean spray booth walls.

Substrate means the surface onto which a coating or contact adhesive is applied (or into which a coating or contact adhesive is impregnated).

Temporary total enclosure means an enclosure that meets the requirements of § 63.805(e)(1) (i) through (iv) and is not permanent, but constructed only to measure the capture efficiency of pollutants emitted from a given source. Additionally, any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each natural draft opening. For additional information, see Guidelines for Determining Capture Efficiency, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

Thinner means a volatile liquid that is used to dilute coatings or contact adhesives (to reduce viscosity, color strength, and solids, or to modify drying conditions).

Topcoat means the last film-building finishing material that is applied in a finishing system.

Touchup and repair means the application of finishing materials to cover minor finishing imperfections.

VHAP means any volatile hazardous air pollutant listed in Table 2 to Subpart JJ.

VHAP of potential concern means any VHAP from the list in table 6 of this subpart.

Volatile organic compound (VOC) means any organic compound which participates in atmospheric photochemical reactions, that is, any organic compound other than those which the Administrator designates as having negligible photochemical reactivity. A VOC may be measured by a reference method, an equivalent method, an alternative method, or by procedures specified under any rule. A reference method, an equivalent method, or an alternative method, however, may also measure nonreactive organic compounds. In such cases, the owner or operator may exclude the nonreactive organic compounds when determining compliance with a standard. For a list of compounds that the Administrator has designated as having negligible photochemical reactivity, refer to 40 CFR part 51.10.

Washcoat means a transparent special purpose finishing material having a solids content by weight of 12.0 percent by weight or less. Washcoats are applied over initial stains to protect, to control color, and to stiffen the wood fibers in order to aid sanding.

Washoff operations means those operations in which organic HAP solvent is used to remove coating from wood furniture or a wood furniture component.

Wood furniture means any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured at any facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components, including, but not limited to, facilities under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.

Wood furniture component means any part that is used in the manufacture of wood furniture. Examples include, but are not limited to, drawer sides, cabinet doors, seat cushions, and laminated tops. However, foam seat cushions manufactured and fabricated at a facility that does not engage in any other wood furniture or wood furniture component manufacturing operation are excluded from this definition.

Wood furniture manufacturing operations means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.
(b) The nomenclature used in this subpart has the following meaning:

1. $A_k$ = the area of each natural draft opening (k) in a total enclosure, in square meters.

2. $C_c$ = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).

3. $C_{aj}$ = the concentration of VHAP in gas stream (j) exiting the control device, in parts per million by volume.

4. $C_{bi}$ = the concentration of VHAP in gas stream (i) entering the control device, in parts per million by volume.

5. $C_{di}$ = the concentration of VHAP in gas stream (i) entering the control device from the affected source, in parts per million by volume.

6. $C_{fk}$ = the concentration of VHAP in uncontrolled gas stream (k) emitted directly to the atmosphere from the affected source, in parts per million by volume.

7. $E$ = the emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids (lb VHAP/lb solids).

8. $F$ = the control device efficiency, expressed as a fraction.

9. $FV$ = the average inward face velocity across all natural draft openings in a total enclosure, in meters per hour.

10. $G$ = the VHAP content of a contact adhesive, in kg VHAP/kg solids (lb VHAP/lb solids), as applied.

11. $M$ = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).

12. $N$ = the capture efficiency, expressed as a fraction.

13. $Q_{aj}$ = the volumetric flow rate of gas stream (j) exiting the control device, in dry standard cubic meters per hour.

14. $Q_{bi}$ = the volumetric flow rate of gas stream (i) entering the control device, in dry standard cubic meters per hour.

15. $Q_{di}$ = the volumetric flow rate of gas stream (i) entering the control device from the emission point, in dry standard cubic meters per hour.

16. $Q_{fk}$ = the volumetric flow rate of uncontrolled gas stream (k) emitted directly to the atmosphere from the emission point, in dry standard cubic meters per hour.

17. $Q_{in}$ = the volumetric flow rate of gas stream (i) entering the total enclosure through a forced makeup air duct, in standard cubic meters per hour (wet basis).

18. $Q_{out}$ = the volumetric flow rate of gas stream (j) exiting the total enclosure through an exhaust duct or hood, in standard cubic meters per hour (wet basis).

19. $R$ = the overall efficiency of the control system, expressed as a percentage.

20. $S$ = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.

21. $W$ = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.
(22) ac=after the control system is installed and operated.

(23) bc=before control.

(24) $C_f =$ the formaldehyde content of a finishing material (c), in pounds of formaldehyde per gallon of coating (lb/gal).

(25) $F_{\text{total}} =$ total formaldehyde emissions in each rolling 12 month period.

(26) $G_f =$ the formaldehyde content of a contact adhesive (g), in pounds of formaldehyde per gallon of contact adhesive (lb/gal).

(27) $V_c =$ the volume of formaldehyde-containing finishing material (c), in gal.

(28) $V_g =$ the volume of formaldehyde-containing contact adhesive (g), in gal.


§ 63.802 Emission limits.

(a) Each owner or operator of an existing affected source subject to this subpart shall:

(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in § 63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in § 63.803(l)(2) for determining styrene and formaldehyde usage.

(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:

(i) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association’s (BIFMA’s) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or

(ii) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented in paragraph (a)(2)(i) of this section, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.

(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

(4) Limit formaldehyde emissions by complying with the provisions specified in either paragraph (a)(4)(i) or (a)(4)(ii) of this section.

(i) Limit total formaldehyde ($F_{\text{total}}$) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.

(ii) Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations.

(b) Each owner or operator of a new affected source subject to this subpart shall:
(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this subpart using any of the compliance methods in § 63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in § 63.803(l)(2) for determining styrene and formaldehyde usage.

(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in § 63.804(e).

(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

(4) Limit formaldehyde emissions by complying with the provisions specified in either paragraph (b)(4)(i) or (b)(4)(ii) of this section.

(i) Limit total formaldehyde ($F_{total}$) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.

(ii) Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations.

(c) At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72072, Nov. 21, 2011]

§ 63.803 Work practice standards.

(a) Work practice implementation plan. (1) Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date.

(2) The written work practice implementation plan shall be available for inspection by the Administrator (or delegated State, local, or Tribal authority) upon request. If the Administrator (or delegated State, local, or Tribal authority) determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator (or delegated State, local, or Tribal authority) may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source’s Title V permit.

(3) The inspection and maintenance plan required by paragraph (c) of this section and the formulation assessment plan for finishing operations required by paragraph (l) of this section are also reviewable by the Administrator (or delegated State, local, or Tribal authority).

(b) Operator training course. Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

(1) A list of all current personnel by name and job description that are required to be trained;
(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

(c) Inspection and maintenance plan. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

(2) An inspection schedule;

(3) Methods for documenting the date and results of each inspection and any repairs that were made;

(4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

(d) Cleaning and washoff solvent accounting system. Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:

(1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in § 63.801 of this subpart;

(2) The number of pieces washed off, and the reason for the washoff; and

(3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

(e) Chemical composition of cleaning and washoff solvents. Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.

(f) Spray booth cleaning. Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the Booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

(g) Storage requirements. Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

(h) Application equipment requirements. Each owner or operator of an affected source shall not use conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device.
(i) **Line cleaning.** Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

(j) **Gun cleaning.** Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

(k) **Washoff operations.** Each owner or operator of an affected source shall control emissions from washoff operations by:

1. Using normally closed tanks for washoff; and
2. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(l) **Formulation assessment plan for finishing operations.** Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

1. Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;
2. Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in § 63.805 (d) or (e).
3. Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
4. If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
   (i) The exceedance is no more than 15.0 percent above the baseline level;
   (ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in § 63.805 (d) or (e);
   (iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
   (iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.
5. If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
(6) If, after November 1998, an affected source uses a VHAP of potential concern listed in table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.


§ 63.804 Compliance procedures and monitoring requirements.

(a) The owner or operator of an existing affected source subject to § 63.802(a)(1) shall comply with those provisions using any of the methods presented in § 63.804 (a)(1) through (a)(4).

(1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;

\[ E = \frac{(M_{c1} C_{c1} + M_{c2} C_{c2} + \ldots + M_{cn} C_{cn} + S_1 W_1 + S_2 W_2 + \ldots + S_n W_n)}{(M_{c1} + M_{c2} + \ldots + M_{cn})} \]  
Equation 1

(2) Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.

(3) Use a control system with an overall control efficiency (R) such that the value of \(E_{ac}\) in Equation 2 is no greater than 1.0.

\[ R = \left\{ \frac{(E_{bc} - E_{ac})}{E_{bc}} \right\} \times 100 \]  
Equation 2

The value of \(E_{bc}\) in Equation 2 shall be calculated using Equation 1; or

(4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.

(b) The owner or operator of an affected source subject to § 63.802(a)(2)(i) shall comply with the provisions by using compliant foam adhesives with a VHAP content no greater than 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied.

(c) The owner or operator of an affected source subject to § 63.802(a)(2)(ii) shall comply with those provisions by using either of the methods presented in § 63.804 (c)(1) and (c)(2).
(1) Use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied; or

(2) Use a control system with an overall control efficiency (R) such that the value of $G_{ac}$ is no greater than 1.0.

$$R = \left( \frac{G_{bc} - G_{ac}}{G_{bc}} \right) (100) \quad \text{Equation 3}$$

(d) The owner or operator of a new affected source subject to § 63.802(b)(1) may comply with those provisions by using any of the following methods:

(1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of $E$ no greater than 0.8;

(2) Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

(3) Use a control system with an overall control efficiency (R) such that the value of $E_{ac}$ in Equation 4 is no greater than 0.8.

$$R = \left( \frac{E_{bc} - E_{ac}}{E_{bc}} \right) (100) \quad \text{Equation 4}$$

The value of $E_{bc}$ in Equation 4 shall be calculated using Equation 1; or

(4) Use any combination of an averaging approach, as described in (d)(1), compliant finishing materials, as described in (d)(2), and a control system, as described in (d)(3).

(e) The owner or operator of a new affected source subject to § 63.802(b)(2) shall comply with the provisions using either of the following methods:

(1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied; or

(2) Use a control system with an overall control efficiency (R) such that the value of $G_{ac}$ in Equation 3 is no greater than 0.2.

(f) Initial compliance. (1) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by § 63.807(b). The first month’s calculation shall include data for the entire month in which the compliance date falls. For example, if the source’s compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.

(2) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(2) or (d)(2) shall submit an initial compliance status report, as
required by § 63.807(b), stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinnors, as applicable, are being used by the affected source.

(3) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that are complying through the procedures established in § 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:

(i) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or

(ii) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

(4) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(3) or (d)(3) shall demonstrate initial compliance by:

(i) Submitting a monitoring plan that identifies each operating parameter to be monitored for the capture device and discusses why each parameter is appropriate for demonstrating continuous compliance;

(ii) Conducting an initial performance test as required under § 63.7 using the procedures and test methods listed in § 63.7 and § 63.805 (c) and (d) or (e);

(iii) Calculating the overall control efficiency (R) following the procedures in § 63.805 (d) or (e); and

(iv) Determining those operating conditions critical to determining compliance and establishing one or more operating parameters that will ensure compliance with the standard.

(A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter.

(B) For compliance with a catalytic incinerator equipped with a fixed catalyst bed, the minimum gas temperature both upstream and downstream of the catalyst bed shall be the operating parameter.

(C) For compliance with a catalytic incinerator equipped with a fluidized catalyst bed, the minimum gas temperature upstream of the catalyst bed and the pressure drop across the catalyst bed shall be the operating parameter.

(D) For compliance with a carbon adsorber, the operating parameters shall be the total regeneration mass stream flow for each regeneration cycle and the carbon bed temperature after each regeneration, or the concentration level of organic compounds exiting the adsorber, unless the owner or operator requests and receives approval from the Administrator to establish other operating parameters.

(E) For compliance with a control device not listed in this section, one or more operating parameter values shall be established using the procedures identified in § 63.804(g)(4)(vi).

(v) Owners or operators complying with § 63.804(f)(4) shall calculate each site-specific operating parameter value as the arithmetic average of the maximum or minimum operating parameter values, as appropriate, that demonstrate compliance with the standards, during the three test runs required by § 63.805(c)(1).

(5) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2) or (b)(2) that comply through the procedures established in § 63.804 (b), (c)(1), or (e)(1), shall submit an initial compliance status report, as required by § 63.807(b), stating that compliant contact adhesives are being used by the affected source.

(6) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2)(ii) or (b)(2) that comply through the procedures established in § 63.804 (c)(2) or (e)(2), shall demonstrate initial compliance by:
(i) Submitting a monitoring plan that identifies each operating parameter to be monitored for the capture device and discusses why each parameter is appropriate for demonstrating continuous compliance;

(ii) Conducting an initial performance test as required under § 63.7 using the procedures and test methods listed in § 63.7 and § 63.805 (c) and (d) or (e);

(iii) Calculating the overall control efficiency (R) following the procedures in § 63.805 (d) or (e); and

(iv) Determining those operating conditions critical to determining compliance and establishing one or more operating parameters that will ensure compliance with the standard.

(A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter.

(B) For compliance with a catalytic incinerator equipped with a fixed catalyst bed, the minimum gas temperature both upstream and downstream of the catalyst shall be the operating parameter.

(C) For compliance with a catalytic incinerator equipped with a fluidized catalyst bed, the minimum gas temperature upstream of the catalyst bed and the pressure drop across the catalyst bed shall be the operating parameters.

(v) Owners or operators complying with § 63.804(f)(6) shall calculate each site-specific operating parameter value as the arithmetic average of the maximum or minimum operating values as appropriate, that demonstrate compliance with the standards, during the three test runs required by § 63.805(c)(1).

(7) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(3) or (b)(3) shall submit an initial compliance status report, as required by § 63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in § 63.803 shall submit an initial compliance status report, as required by § 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

(g) Continuous compliance demonstrations. (1) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(2) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
(3) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that are complying through the procedures established in § 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in paragraph (g)(3) (i) or (ii) of this section.

(i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required by § 63.807(c).

(A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(ii) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semiannual report required by § 63.807(c).

(A) The compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(C) An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in § 63.804 (a)(2) or (d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.

(4) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(1) or (b)(1) that comply through the procedures established in § 63.804 (a)(3) or (d)(3) shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to manufacturer’s specifications. The owner or operator shall also submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.807(d) and § 63.10(e) of subpart A.

(i) Where a capture/control device is used, a device to monitor each site-specific operating parameter established in accordance with § 63.804(f)(6)(i) is required.

(ii) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.

(A) Where a thermal incinerator is used, a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

(B) Where a catalytic incinerator equipped with a fixed catalyst bed is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.

(C) Where a catalytic incinerator equipped with a fluidized catalyst bed is used, a temperature monitoring device shall be installed in the gas stream immediately before the bed. In addition, a pressure monitoring device shall be installed to determine the pressure drop across the catalyst bed. The pressure drop shall be measured monthly at a constant flow rate.
(iii) Where a carbon adsorber is used one of the following is required:

(A) An integrating stream flow monitoring device having an accuracy of ±10 percent, capable of recording the total regeneration stream mass flow for each regeneration cycle; and a carbon bed temperature monitoring device, having an accuracy of ±1 percent of the temperature being monitored or ±0.5 °C, whichever is greater, and capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle;

(B) An organic monitoring device, equipped with a continuous recorder, to indicate the concentration level of organic compounds exiting the carbon adsorber; or

(C) Any other monitoring device that has been approved by the Administrator in accordance with § 63.804(f)(4)(iv)(D).

(iv) Owners or operators of an affected source shall not operate the capture or control device at a daily average value greater than or less than (as appropriate) the operating parameter values. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.

(v) Owners or operators of an affected source that are complying through the use of a catalytic incinerator equipped with a fluidized catalyst bed shall maintain a constant pressure drop, measured monthly, across the catalyst bed.

(vi) An owner or operator who uses a control device not listed in § 63.804(f)(4) shall submit, for the Administrator’s approval, a description of the device, test data verifying performance, and appropriate site-specific operating parameters that will be monitored to demonstrate continuous compliance with the standard.

(5) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2) (i) or (ii) or (b)(2) that comply through the procedures established in § 63.804 (b), (c)(1), or (e)(1), shall submit a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(6) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(2)(ii) or (b)(2) that comply through the procedures established in § 63.804 (c)(2) or (e)(2), shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to the manufacturer’s specifications. The owner or operator shall also submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.807(d) and § 63.10(e) of subpart A of this part.

(i) Where a capture/control device is used, a device to monitor each site-specific operating parameter established in accordance with § 63.804(f)(6)(i) is required.

(ii) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.

(A) Where a thermal incinerator is used, a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

(B) Where a catalytic incinerator equipped with a fixed catalyst bed is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.

(C) Where a catalytic incinerator equipped with a fluidized catalyst bed is used, a temperature monitoring device shall be installed in the gas stream immediately before the bed. In addition, a pressure monitoring device shall be installed to measure the pressure drop across the catalyst bed. The pressure drop shall be measured monthly at a constant flow rate.
(iii) Where a carbon adsorber is used one of the following is required:

(A) An integrating stream flow monitoring device having an accuracy of ±10 percent, capable of recording the total regeneration stream mass flow for each regeneration cycle; and a carbon bed temperature monitoring device, having an accuracy of ±1 percent of the temperature being monitored or ±0.5 °C, whichever is greater, and capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle;

(B) An organic monitoring device, equipped with a continuous recorder, to indicate the concentration level of organic compounds exiting the carbon adsorber; or

(C) Any other monitoring device that has been approved by the Administrator in accordance with § 63.804(f)(4)(iv)(D).

(iv) Owners or operators of an affected source shall not operate the capture or control device at a daily average value greater than or less than (as appropriate) the operating parameter values. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.

(v) Owners or operators of an affected source that are complying through the use of a catalytic incinerator equipped with a fluidized catalyst bed shall maintain a constant pressure drop, measured monthly, across the catalyst bed.

(vi) An owner or operator using a control device not listed in this section shall submit to the Administrator a description of the device, test data verifying the performance of the device, and appropriate operating parameter values that will be monitored to demonstrate continuous compliance with the standard. Compliance using this device is subject to the Administrator's approval.

(7) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in § 63.803 shall submit a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(9) Continuous compliance requirements. You must demonstrate continuous compliance with the emissions standards and operating limits by using the performance test methods and procedures in § 63.805 for each affected source.

(i) General requirements. (A) You must monitor and collect data, and provide a site specific monitoring plan as required by §§ 63.804, 63.806 and 63.807.

(B) Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks and required zero and span adjustments), you must operate the monitoring system and collect data at all required intervals at all times the affected source is operating and periods of malfunction. Any period for which data collection is required and the operation of the CEMS is not otherwise exempt and for which the monitoring system is
out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.

(C) You may not use data recorded during monitoring system malfunctions, repairs associated with monitoring system malfunctions, or required monitoring system quality assurance or control activities in calculations used to report emissions or operating levels. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The owner or operator must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(ii) [Reserved]

(h) The owner or operator of an existing or new affected source subject to § 63.802(a)(4) or (b)(4) shall comply with those provisions by using either of the methods presented in § 63.804(h)(1) and (2) if complying with § 63.802(a)(4)(i) or (b)(4)(i) or by using the method presented in § 63.804(h)(3) if complying with § 63.802(a)(4)(ii) or (b)(4)(ii).

(1) Calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 5 and maintain a value of $F_{\text{total}}$ no more than 400 pounds per rolling 12 month period.

$$F_{\text{total}} = (C_{f1}V_{c1} + C_{f2}V_{c2} + \ldots + C_{fn}V_{cn} + G_{f1}V_{g1} + G_{f2}V_{g2} + \ldots + G_{fn}V_{gn}) \quad \text{Equation 5}$$

(2) Use a control system with an overall control efficiency $(R)$ such that the calculated value of $F_{\text{total}}$ in Equation 6 is no more than 400 pounds per rolling 12 month period.

$$F_{\text{total}} = (C_{f1}V_{c1} + C_{f2}V_{c2} + \ldots + C_{fn}V_{cn} + G_{f1}V_{g1} + G_{f2}V_{g2} + \ldots + G_{fn}V_{gn}) \times (1-R) \quad \text{Equation 6}$$

(3) Demonstrate compliance by use of coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives maintaining a certified product data sheet for each coating and contact adhesive used, as required by § 63.806(b)(1), and submitting a compliance certification with the semiannual report required by § 63.807(c).

(i) The compliance certification shall state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact adhesive that is not low-formaldehyde, as demonstrated by records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72073, Nov. 21, 2011]

§ 63.805 Performance test methods.

(a)(1) The EPA Method 311 of appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the
Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

(2) Performance tests shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

(b) Owners or operators demonstrating compliance in accordance with § 63.804 (f)(4) or (f)(6) and § 63.804 (g)(4) or (g)(6), or complying with any of the other emission limits of § 63.802 by operating a capture or control device shall determine the overall control efficiency of the control system (R) as the product of the capture and control device efficiency, using the test methods cited in § 63.805(c) and the procedures in § 63.805 (d) or (e).

(c) When an initial compliance demonstration is required by § 63.804 (f)(4) or (f)(6) of this subpart, the procedures in paragraphs (c)(1) through (c)(6) of this section shall be used in determining initial compliance with the provisions of this subpart.

(1) The EPA Method 18 (40 CFR part 60, appendix A) shall be used to determine the HAP concentration of gaseous air streams. The test shall consist of three separate runs, each lasting a minimum of 30 minutes.

(2) The EPA Method 1 or 1A (40 CFR part 60, appendix A) shall be used for sample and velocity traverses.

(3) The EPA Method 2, 2A, 2C, or 2D (40 CFR part 60, appendix A) shall be used to measure velocity and volumetric flow rates.

(4) The EPA Method 3 (40 CFR part 60, appendix A) shall be used to analyze the exhaust gases.

(5) The EPA Method 4 (40 CFR part 60, appendix A) shall be used to measure the moisture in the stack gas.

(6) The EPA Methods 2, 2A, 2C, 2D, 3, and 4 shall be performed, as applicable, at least twice during each test period.

(d) Each owner or operator of an affected source demonstrating compliance in accordance with § 63.804 (f)(4) or (f)(6) shall perform a gaseous emission test using the following procedures:

(1) Construct the overall HAP emission reduction system so that all volumetric flow rates and total HAP emissions can be accurately determined by the applicable test methods specified in § 63.805(c) (1) through (6);

(2) Determine capture efficiency from the affected emission point(s) by capturing, venting, and measuring all HAP emissions from the affected emission point(s). During a performance test, the owner or operator shall isolate affected emission point(s) located in an area with other nonaffected gaseous emission sources from all other gaseous emission point(s) by any of the following methods:

(i) Build a temporary total enclosure (see § 63.801) around the affected emission point(s); or

(ii) Use the building that houses the process as the enclosure (see § 63.801);

(iii) Use any alternative protocol and test method provided they meet either the requirements of the data quality objective (DQO) approach or the lower confidence level (LCL) approach (see § 63.801);
(iv) Shut down all nonaffected HAP emission point(s) and continue to exhaust fugitive emissions from the affected emission point(s) through any building ventilation system and other room exhausts such as drying ovens. All exhaust air must be vented through stacks suitable for testing; or

(v) Use another methodology approved by the Administrator provided it complies with the EPA criteria for acceptance under part 63, appendix A, Method 301.

(3) Operate the control device with all affected emission points that will subsequently be delivered to the control device connected and operating at maximum production rate;

(4) Determine the efficiency (F) of the control device using the following equation:

\[
F = \frac{\sum_{i=1}^{n} Q_{ni} C_{ni} - \sum_{j=1}^{p} Q_{nj} C_{nj}}{\sum_{i=1}^{n} Q_{ni} C_{ni}} \quad (Equation 5)
\]

(5) Determine the efficiency (N) of the capture system using the following equation:

\[
N = \frac{\sum_{i=1}^{n} Q_{di} C_{di}}{\sum_{i=1}^{n} Q_{di} C_{di} + \sum_{k=1}^{q} Q_{sk} C_{sk}} \quad (Equation 6)
\]

(6) For each affected source complying with § 63.802(a)(1) in accordance with § 63.804(a)(3), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of Eac in Equation 2 is no greater than 1.0.

(7) For each new affected source complying with § 63.802(b)(1) in accordance with § 63.804(d)(3), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of Eac in Equation 4 is no greater than 0.8.

(8) For each affected source complying with § 63.802(a)(2)(ii) in accordance with § 63.804(c)(2), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of Gac in Equation 3 is no greater than 1.0.

(9) For each new affected source complying with § 63.802(b)(2) in accordance with § 63.804(e)(2), compliance is demonstrated if the product of (F×N)(100) yields a value (R) such that the value of Gac in Equation 3 is no greater than 0.2.

(e) An alternative method to the compliance method in § 63.805(d) is the installation of a permanent total enclosure around the affected emission point(s). A permanent total enclosure presents prima facie evidence that all HAP emissions from the affected emission point(s) are directed to the control device. Each affected source that complies using a permanent total enclosure shall:

(1) Demonstrate that the total enclosure meets the requirements in paragraphs (e)(1) (i) through (iv). The owner or operator of an enclosure that does not meet these requirements may apply to the Administrator for approval of the enclosure as a total enclosure on a case-by-case basis. The enclosure shall be considered a total enclosure if it is demonstrated to the satisfaction of the Administrator that all HAP emissions from the affected emission point(s) are contained and vented to the control device. The requirements for automatic approval are as follows:

(i) The total area of all natural draft openings shall not exceed 5 percent of the total surface area of the total enclosure's walls, floor, and ceiling;
(ii) All sources of emissions within the enclosure shall be a minimum of four equivalent diameters away from each natural draft opening;

(iii) The average inward face velocity (FV) across all natural draft openings shall be a minimum of 3,600 meters per hour as determined by the following procedures:

(A) All forced makeup air ducts and all exhaust ducts are constructed so that the volumetric flow rate in each can be accurately determined by the test methods specified in § 63.805 (c)(2) and (3). Volumetric flow rates shall be calculated without the adjustment normally made for moisture content; and

(B) Determine FV by the following equation:

$$FV = \frac{\sum_{j=1}^{q} Q_{out,j} - \sum_{i=1}^{p} Q_{in,i}}{\sum_{k=1}^{q} A_k}$$  \hspace{1cm} (Equation 7)

(iv) All access doors and windows whose areas are not included as natural draft openings and are not included in the calculation of FV shall be closed during routine operation of the process.

(2) Determine the control device efficiency using Equation (5), and the test methods and procedures specified in § 63.805 (c)(1) through (6).

(3) For each affected source complying with § 63.802(a)(1) in accordance with § 63.804(a)(3), compliance is demonstrated if:

(i) The installation of a permanent total enclosure is demonstrated (N=1);

(ii) The value of F is determined from Equation (5); and

(iii) The product of (F×N)(100) yields a value (R) such that the value of Eac in Equation 2 is no greater than 1.0.

(4) For each new affected source complying with § 63.802(b)(1) in accordance with § 63.804(d)(3), compliance is demonstrated if:

(i) The installation of a permanent total enclosure is demonstrated (N = 1);

(ii) The value of F is determined from Equation (5); and

(iii) The product of (F×N)(100) yields a value (R) such that the value of Eac in Equation 4 is no greater than 0.8.

(5) For each affected source complying with § 63.802(a)(2)(ii) in accordance with § 63.804(c)(2), compliance is demonstrated if:

(i) The installation of a permanent total enclosure is demonstrated (N=1);

(ii) The value of F is determined from Equation (5); and

(iii) The product of (F×N)(100) yields a value (R) such that the value of Gac in Equation 3 is no greater than 1.0.

(6) For each new affected source complying with § 63.802(b)(2) in accordance with § 63.804(e)(2), compliance is demonstrated if:
(i) The installation of a permanent total enclosure is demonstrated \((N=1)\); 

(ii) The value of \(F\) is determined from Equation (5); and

(iii) The product of \((F \times N)(100)\) yields a value \((R)\) such that the value of \(G_{ac}\) in Equation 3 is no greater than 0.2.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72073, Nov. 21, 2011]

§ 63.806 Recordkeeping requirements.

(a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of § 63.10 of subpart A, according to the applicability criteria in § 63.800(d) of this subpart.

(b) The owner or operator of an affected source subject to the emission limits in § 63.802 of this subpart shall maintain records of the following:

1. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in § 63.802; and

2. The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in § 63.802; and

3. The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in § 63.802 (a)(3) or (b)(3).

4. The formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits in § 63.802(a)(4) or (b)(4) and chooses to comply with the 400 lb/yr limits on formaldehyde in § 63.802(a)(4)(i) or (b)(4)(i).

(c) The owner or operator of an affected source following the compliance method in § 63.804 (a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of \(E\) in Equation 1.

(d) The owner or operator of an affected source following the compliance procedures of § 63.804 (f)(3)(ii) and (g)(3)(ii) shall maintain the records required by § 63.806(b) as well as records of the following:

1. Solvent and coating additions to the continuous coater reservoir;

2. Viscosity measurements; and

3. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.

(e) The owner or operator of an affected source subject to the work practice standards in § 63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

1. Records demonstrating that the operator training program required by § 63.803(b) is in place;

2. Records collected in accordance with the inspection and maintenance plan required by § 63.803(c);

3. Records associated with the cleaning solvent accounting system required by § 63.803(d);

4. [Reserved]

5. Records associated with the formulation assessment plan required by § 63.803(l); and
(6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

(f) The owner or operator of an affected source following the compliance method of § 63.804 (f)(4) or (g)(4) shall maintain copies of the calculations demonstrating that the overall control efficiency (R) of the control system results in the value of $E_a$ required by Equations 2 or 4, records of the operating parameter values, and copies of the semiannual compliance reports required by § 63.807(d).

(g) The owner or operator of an affected source following the compliance method of § 63.804 (f)(6) or (g)(6), shall maintain copies of the calculations demonstrating that the overall control efficiency (R) of the control system results in the applicable value of $G_a$ calculated using Equation 3, records of the operating parameter values, and copies of the semiannual compliance reports required by § 63.807(d).

(h) The owner or operator of an affected source subject to the emission limits in § 63.802 and following the compliance provisions of § 63.804(f) (1), (2), (3), (5), (7) and (8) and § 63.804(g) (1), (2), (3), (5), (7), (8) shall maintain records of the compliance certifications submitted in accordance with § 63.807(c) for each semiannual period following the compliance date.

(i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by § 63.9(h) and § 63.807(b) and the semiannual reports required by § 63.807(c).

(j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of § 63.10(b)(1).

(k) The owner or operator of an affected source subject to this subpart shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The owner or operator shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.802(c), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]

§ 63.807 Reporting requirements.

(a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of § 63.7 through § 63.10 of subpart A (General Provisions) according to the applicability criteria in § 63.800(d) of this subpart.

(b) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(f)(1), (2), (3), (5), (7), and (8) shall submit the compliance status report required by § 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by § 63.804(f)(1), (2), (3), (5), (7), and (8) of this subpart.

(c) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(g)(1), (2), (3), (5), (7), (8), (h)(1), and (h)(3) shall submit a report covering the previous 6 months of wood furniture manufacturing operations.

(1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

(2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

(3) The semiannual reports shall include the information required by § 63.804(g)(1), (2), (3), (5), (7), (8), (h)(1), and (h)(3), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance. If there was a malfunction during the reporting period, the report shall also include the number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable
emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.802(c), including actions taken to correct a malfunction.

(4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

(d) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(g)(4), (6), and (h)(2) of this subpart shall submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.10(e) of subpart A. The report shall include the monitored operating parameter values required by § 63.804(g)(4) and (6). If the source experiences excess emissions, the report shall be submitted quarterly for at least 1 year after the excess emissions occur and until a request to reduce reporting frequency is approved, as indicated in § 63.10(e)(3)(C). If no excess emissions occur, the report shall be submitted semiannually.

(e) The owner or operator of an affected source required to provide a written notification under § 63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]

§ 63.808 Implementation and enforcement.

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of alternatives to the requirements in §§ 63.800, 63.802, and 63.803(a)(1), (b), (c) introductory text, and (d) through (l).

(2) Approval of alternatives to the monitoring and compliance requirements in §§ 63.804(f)(4)(iv)(D) and (E), 63.804(g)(4)(iii)(C), 63.804(g)(4)(vi), and 63.804(g)(6)(vi).

(3) Approval of major alternatives to test methods under § 63.7(e)(2)(ii) and (f), as defined in § 63.90, and as required in this subpart, as well as approval of any alternatives to the specific test methods under §§ 63.805(a), 63.805(d)(2)(v), and 63.805(e)(1).

(4) Approval of major alternatives to monitoring under § 63.8(f), as defined in § 63.90, and as required in this subpart.

(5) Approval of major alternatives to recordkeeping and reporting under § 63.10(f), as defined in § 63.90, and as required in this subpart.

[68 FR 37354, June 23, 2003]
**Table 1 to Subpart JJ of Part 63—General Provisions Applicability to Subpart JJ**

<table>
<thead>
<tr>
<th>Reference</th>
<th>Applies to subpart JJ</th>
<th>Comment</th>
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<tbody>
<tr>
<td>63.1(a)</td>
<td>Yes</td>
<td></td>
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<tr>
<td>63.1(b)(1) No</td>
<td>Subpart JJ specifies applicability.</td>
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<td>63.1(b)(2) Yes</td>
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<td>63.1(b)(3) Yes</td>
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<tr>
<td>63.1(c)(1) No</td>
<td>Subpart JJ specifies applicability.</td>
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<tr>
<td>63.1(c)(2) No</td>
<td>Area sources are not subject to subpart JJ.</td>
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<td>63.1(c)(4) Yes</td>
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<td>63.1(c)(5) Yes</td>
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<td>63.1(e) Yes</td>
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<tr>
<td>63.2 Yes</td>
<td>Additional terms are defined in 63.801(a) of subpart JJ. When overlap between subparts A and JJ occurs, subpart JJ takes precedence.</td>
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<tr>
<td>63.3 Yes</td>
<td>Other units used in subpart JJ are defined in 63.801(b).</td>
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<td>63.4 Yes</td>
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<td>63.5 Yes</td>
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<td>63.6(a) Yes</td>
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<td>63.6(b)(3) Yes</td>
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<td>63.6(b)(4) No</td>
<td>May apply when standards are proposed under Section 112(f) of the CAA.</td>
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<td>63.6(b)(5) Yes</td>
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<td>63.6(b)(7) Yes</td>
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<td>63.6(c)(1) Yes</td>
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<td>63.6(c)(2) No</td>
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<td>63.6(c)(5) Yes</td>
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<tr>
<td>63.6(e)(1)(i) No</td>
<td>See § 63.802(c) for general duty requirement.</td>
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<tr>
<td>63.6(e)(1)(ii) No</td>
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<tr>
<td>63.6(e)(1)(iii) Yes</td>
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<td>63.6(e)(2) No</td>
<td>Section reserved.</td>
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<td>63.6(e)(3) No</td>
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<tr>
<td>63.6(f)(1) No</td>
<td>Affected sources complying through the procedures specified in 63.804 (a)(1), (a)(2), (b), (c)(1), (d)(1), (d)(2), (e)(1), and (e)(2) are subject to the emission standards at all times, including periods of startup, shutdown, and malfunction.</td>
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<td>63.6(f)(2) Yes</td>
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<td>63.6(f)(3) Yes</td>
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<td>63.6(g) Yes</td>
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<tr>
<td>63.6(h) No</td>
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<tr>
<td>63.6 (i)(1)-(i)(3) Yes</td>
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<td>63.6(i)(4)(i) Yes</td>
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<tr>
<td>63.6(i)(4)(ii) No</td>
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<td>63.6 (i)(5)-(i)(14) Yes</td>
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<td>63.6(i)(16) Yes</td>
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<td>Applies to subpart JJ</td>
<td>Comment</td>
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<td>63.6(j)</td>
<td>Yes</td>
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<td>63.7(a)-(d)</td>
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<td>Applies only to affected sources using a control device to comply with the rule.</td>
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<td>63.7(e)(1)</td>
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<td>See § 63.805(a)(1).</td>
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<td>Applies only to affected sources using a control device to comply with the rule.</td>
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<td>63.8(a)-(b)</td>
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<td>63.8(c)(1)(ii)</td>
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<td>63.8(c)(1)(iii)</td>
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<td>63.8(d)(3)</td>
<td>Yes, except for last sentence</td>
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<td>63.8(e)-(g)</td>
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<td>63.9(a)</td>
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<tr>
<td>63.9(b)</td>
<td>Yes</td>
<td>Existing sources are required to submit initial notification report within 270 days of the effective date.</td>
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<tr>
<td>63.9(c)</td>
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<tr>
<td>63.9(d)</td>
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<td>63.9(e)</td>
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<tr>
<td>63.9(h)</td>
<td>Yes</td>
<td>63.9(h)(2)(ii) applies only to affected sources using a control device to comply with the rule.</td>
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<tr>
<td>63.9(i)</td>
<td>Yes</td>
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<tr>
<td>63.9(j)</td>
<td>Yes</td>
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<tr>
<td>63.10(a)</td>
<td>Yes</td>
<td></td>
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<td>63.10(b)(1)</td>
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<tr>
<td>63.10(b)(2)(i)</td>
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</tr>
<tr>
<td>63.10(b)(2)(ii)</td>
<td>No</td>
<td>See § 63.806(k) for recordkeeping of occurrence and duration of malfunctions and recordkeeping of actions taken during malfunctions.</td>
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<td>63.10(b)(2)(iii)</td>
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<td>Applies only to affected sources using a control device to comply with the rule.</td>
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<td>63.10(b)(2)(iv)-(b)(2)(v)</td>
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<td>63.10(b)(2)(vi)-(b)(2)(xiv)</td>
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<td>Applies only to affected sources using a control device to comply with the rule.</td>
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<td>63.10(b)(3)</td>
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<td>63.10(c)(1)-(9)</td>
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<tr>
<td>63.10(c)(10)-(11)</td>
<td>No</td>
<td>See § 63.806(k) for recordkeeping of malfunctions.</td>
</tr>
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<td>63.10(c)(12)-(14)</td>
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<td>63.10(c)(15)</td>
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<td>63.10(d)(1)</td>
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<td>63.10(d)(4)</td>
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<td>63.10(d)(5)</td>
<td>No</td>
<td>See § 63.807(c)(3) for reporting of malfunctions.</td>
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<td>63.10(e)</td>
<td>Yes</td>
<td>Applies only to affected sources using a control device to comply with the rule.</td>
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<td>Reference</td>
<td>Applies to subpart JJ</td>
<td>Comment</td>
</tr>
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<td>63.10(f)</td>
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<td>63.11</td>
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<td>63.12-63.15</td>
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[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]

Table 2 to Subpart JJ of Part 63—List of Volatile Hazardous Air Pollutants

<table>
<thead>
<tr>
<th>Chemical name</th>
<th>CAS No.</th>
</tr>
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<tbody>
<tr>
<td>Acetaldehyde</td>
<td>75070</td>
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<tr>
<td>Acetamide</td>
<td>60355</td>
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<tr>
<td>Acetonitrile</td>
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</tr>
<tr>
<td>Acetophenone</td>
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<tr>
<td>2-Acetylaminochlorofluorine</td>
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</tr>
<tr>
<td>Acrolein</td>
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</tr>
<tr>
<td>Acrylamide</td>
<td>79061</td>
</tr>
<tr>
<td>Acrylic acid</td>
<td>79107</td>
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<tr>
<td>Acrylonitrile</td>
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<tr>
<td>Allyl chloride</td>
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<td>4-Aminobiphenyl</td>
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<tr>
<td>Aniline</td>
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<tr>
<td>o-Anisidine</td>
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<tr>
<td>Benzene</td>
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<td>Benzidine</td>
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<td>Benzotrichloride</td>
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<td>Benzyl chloride</td>
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<tr>
<td>Biphenyl</td>
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<tr>
<td>Bis (2-ethylhexyl) phthalate (DEHP)</td>
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<tr>
<td>Bis (chloromethyl) ether</td>
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<td>Bromoform</td>
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<tr>
<td>Carbon disulfide</td>
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<td>Carbon tetrachloride</td>
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<td>Carbonyl sulfide</td>
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<td>Catechol</td>
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<td>Chloroacetic acid</td>
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<td>Chlorobenzene</td>
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<td>Chloroform</td>
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<td>Chloromethyl methyl ether</td>
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<td>Chloroprene</td>
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<tr>
<td>Cresols (isomers and mixture)</td>
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<td>o-Cresol</td>
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<td>m-Cresol</td>
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<td>Chemical name</td>
<td>CAS No.</td>
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<tr>
<td>p-Cresol</td>
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<tr>
<td>Cumene</td>
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<tr>
<td>2,4-D (2,4-Dichlorophenoxyacetic acid, including salts and esters)</td>
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<td>DDE (1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene)</td>
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<td>Diazomethane</td>
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<td>Dibenzo furan</td>
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<td>1,2-Dibromo-3-chloropropane</td>
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<td>Dibutylphthalate</td>
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<td>1,4-Dichlorobenzene</td>
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<td>3,3′-Dichlorobenzidine</td>
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<td>Dichloroethyl ether (Bis(2-chloroethyl)ether)</td>
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<td>1,3-Dichloropropene</td>
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<td>Diethanolamine</td>
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<td>Diethyl sulfate</td>
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<td>3,3′-Dimethoxybenzidine</td>
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<td>4-Dimethylaminoazobenzene</td>
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<td>3,3′-Dimethylbenzidine</td>
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<td>Dimethylcarbamoyl chloride</td>
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<td>N,N-Dimethylformamide</td>
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<td>1,1-Dimethylhydrazine</td>
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<td>Dimethyl phthalate</td>
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<td>Dimethyl sulfate</td>
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<td>4,6-Dinitro-o-cresol, and salts</td>
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<td>2,4-Dinitrotoluene</td>
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<td>1,4-Dioxane (1,4-Diethyleneoxide)</td>
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<td>1,2-Diphenylhydrazine</td>
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<td>Epichlorohydrin (1-Chloro-2,3-epoxypropane)</td>
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<td>1,2-Epoxybutane</td>
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<td>Ethyl acrylate</td>
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<td>Ethyl benzene</td>
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<td>Ethyl carbamate (Urethane)</td>
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<td>Ethyl chloride (Chloroethane)</td>
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<td>Ethylene dibromide (Dibromoethane)</td>
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<td>Ethylene dichloride (1,2-Dichloroethane)</td>
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<td>Ethylene glycol</td>
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<td>Ethylenetriurea</td>
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<td>Ethyldene dichloride (1,1-Dichloroethane)</td>
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<tr>
<td>Hexachloroethane</td>
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<td>Hexamethylene-1,6-diisocyanate</td>
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<td>Methyl isobutyl ketone (Hexone)</td>
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<td>4,4′-Methylenediphenyl disocyanate (MDI)</td>
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<td>Phosgene</td>
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<td>Polychlorinated biphenyls (Aroclors)</td>
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<td>1,2-Propylenimine (2-Methyl aziridine)</td>
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<td>Chemical name</td>
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<td>Quinone</td>
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<td>Styrene oxide</td>
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<td>Tetrachloroethylene (Perchloroethylene)</td>
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<td>1,1,2-Trichloroethane</td>
<td>79005</td>
</tr>
<tr>
<td>Trichloroethylene</td>
<td>79016</td>
</tr>
<tr>
<td>2,4,5-Trichlorophenol</td>
<td>95954</td>
</tr>
<tr>
<td>2,4,6-Trichlorophenol</td>
<td>88062</td>
</tr>
<tr>
<td>Triethylamine</td>
<td>121448</td>
</tr>
<tr>
<td>Trifluralin</td>
<td>1582098</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>540841</td>
</tr>
<tr>
<td>Vinyl acetate</td>
<td>108054</td>
</tr>
<tr>
<td>Vinyl bromide</td>
<td>593602</td>
</tr>
<tr>
<td>Vinyl chloride</td>
<td>75014</td>
</tr>
<tr>
<td>Vinylidene chloride (1,1-Dichloroethylene)</td>
<td>75354</td>
</tr>
<tr>
<td>Xylenes (isomers and mixture)</td>
<td>1330207</td>
</tr>
<tr>
<td>o-Xylene</td>
<td>95476</td>
</tr>
<tr>
<td>m-Xylene</td>
<td>108383</td>
</tr>
<tr>
<td>p-Xylene</td>
<td>106423</td>
</tr>
</tbody>
</table>

\[a\] Includes mono- and di-ethers of ethylene glycol, diethylene glycols and triethylene glycol; \(R-\text{OCH}_2\text{CH}_2\text{RR}^{-}\text{OR}\) where:

\[n = 1, 2, \text{or} 3,\]

\[R = \text{alkyl or aryl groups}\]

\[R' = \text{R, H, or groups which, when removed, yield glycol ethers with the structure: } R-\text{(OCH}_2\text{CH}_2\text{)}_n-\text{OH.}\] Polymers are excluded from the glycol category.

\[b\] Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.

[63 FR 71381, Dec. 28, 1998]

**Table 3 to Subpart JJ of Part 63—Summary of Emission Limits**

<table>
<thead>
<tr>
<th>Emission point</th>
<th>Existing source</th>
<th>New source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finishing Operations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emission point</td>
<td>Existing source</td>
<td>New source</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------</td>
<td>-----------------</td>
<td>------------</td>
</tr>
<tr>
<td>(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)</td>
<td>a 1.0</td>
<td>a 0.8</td>
</tr>
<tr>
<td>(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---stains</td>
<td>a 1.0</td>
<td>a 1.0</td>
</tr>
<tr>
<td>---washcoats</td>
<td>a,b 1.0</td>
<td>a,b 0.8</td>
</tr>
<tr>
<td>---sealers</td>
<td>a 1.0</td>
<td>a 0.8</td>
</tr>
<tr>
<td>---topcoats</td>
<td>a 1.0</td>
<td>a 0.8</td>
</tr>
<tr>
<td>---basecoats</td>
<td>a,b 1.0</td>
<td>a,b 0.8</td>
</tr>
<tr>
<td>---enamels</td>
<td>a,b 1.0</td>
<td>a,b 0.8</td>
</tr>
<tr>
<td>---thinners (maximum percent VHAP allowable); or</td>
<td>10.0</td>
<td>10.0</td>
</tr>
<tr>
<td>(c) As an alternative, use control device; or</td>
<td>c 1.0</td>
<td>c 0.8</td>
</tr>
<tr>
<td>(d) Use any combination of (a), (b), and (c)</td>
<td>1.0</td>
<td>0.8</td>
</tr>
</tbody>
</table>

Cleaning Operations:

| Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids]) | 0.8 | 0.8 |

Contact Adhesives:

| (a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria: |
| i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates | d NA | d NA |
| ii. For foam adhesives used in products that meet flammability requirements | 1.8 | 0.2 |
| iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or | 1.0 | 0.2 |
| (b) Use a control device                                                      | e 1.0 | e 0.2 |

All Finishing Operations and Contact Adhesives:

| (a) Achieve total free formaldehyde emissions across all finishing operations and contact adhesives, lb per rolling 12 month period, as applied | 400 | 400 |
| (b) Use coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives | f 1.0 | f 1.0 |

---

**Footnotes:**

- **a** The limits refer to the VHAP content of the coating, as applied.
- **b** Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.
- **c** The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.
- **d** There is no limit on the VHAP content of these adhesives.
- **e** The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.
- **f** The limits refer to the formaldehyde content by weight of the coating or contact adhesive, as specified on certified product data sheets.
Table 4 to Subpart JJ of Part 63—Pollutants Excluded From Use in Cleaning and Washoff Solvents

<table>
<thead>
<tr>
<th>Chemical name</th>
<th>CAS No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>4-Aminobiphenyl</td>
<td>92671</td>
</tr>
<tr>
<td>Styrene oxide</td>
<td>96093</td>
</tr>
<tr>
<td>Diethyl sulfate</td>
<td>64675</td>
</tr>
<tr>
<td>N-Nitrosomorpholine</td>
<td>59892</td>
</tr>
<tr>
<td>Dimethyl formamide</td>
<td>68122</td>
</tr>
<tr>
<td>Hexamethylphosphoramide</td>
<td>680319</td>
</tr>
<tr>
<td>Acetamide</td>
<td>60355</td>
</tr>
<tr>
<td>4,4′-Methylenedianiline</td>
<td>101779</td>
</tr>
<tr>
<td>o-Anisidine</td>
<td>90040</td>
</tr>
<tr>
<td>2,3,7,8-Tetrachlorodibenzo-p-dioxin</td>
<td>1746016</td>
</tr>
<tr>
<td>Beryllium salts</td>
<td></td>
</tr>
<tr>
<td>Benzidine</td>
<td>92875</td>
</tr>
<tr>
<td>N-Nitroso-N-methylurea</td>
<td>684935</td>
</tr>
<tr>
<td>Bis (chloromethyl) ether</td>
<td>542881</td>
</tr>
<tr>
<td>Dimethyl carbamoyl chloride</td>
<td>79447</td>
</tr>
<tr>
<td>Chromium compounds (hexavalent)</td>
<td></td>
</tr>
<tr>
<td>1,2-Propylenamine (2-Methyl aziridine)</td>
<td>75558</td>
</tr>
<tr>
<td>Arsenic and inorganic arsenic compounds</td>
<td>99999904</td>
</tr>
<tr>
<td>Hydrazine</td>
<td>302012</td>
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<tr>
<td>1,1-Dimethyl hydrazine</td>
<td>57147</td>
</tr>
<tr>
<td>Beryllium compounds</td>
<td>7440417</td>
</tr>
<tr>
<td>1,2-Dibromo-3-chloropropane</td>
<td>96128</td>
</tr>
<tr>
<td>N-Nitrosodimethylamine</td>
<td>62759</td>
</tr>
<tr>
<td>Cadmium compounds</td>
<td></td>
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<tr>
<td>Benzo (a) pyrene</td>
<td>50328</td>
</tr>
<tr>
<td>Polychlorinated biphenyls (Aroclors)</td>
<td>1336363</td>
</tr>
<tr>
<td>Heptachlor</td>
<td>76448</td>
</tr>
<tr>
<td>3,3′-Dimethyl benzidine</td>
<td>119937</td>
</tr>
<tr>
<td>Nickel subsulfide</td>
<td>12035722</td>
</tr>
<tr>
<td>Acrylamide</td>
<td>79061</td>
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<tr>
<td>Hexachlorobenzene</td>
<td>118741</td>
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<tr>
<td>Chlordane</td>
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<tr>
<td>1,3-Propane sultone</td>
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<tr>
<td>1,3-Butadiene</td>
<td>106990</td>
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<td>Nickel refinery dust</td>
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<td>2-Acetylaminoflourine</td>
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<tr>
<td>3,3′-Dichlorobenzidine</td>
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<tr>
<td>Lindane (hexachlorocyclohexane, gamma)</td>
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<tr>
<td>2,4-Toluene diamine</td>
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</tr>
<tr>
<td>Dichloroethyl ether (Bis(2-chloroethyl) ether)</td>
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<tr>
<td>1,2-Diphenylhydrazine</td>
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<tr>
<td>Chemical name</td>
<td>CAS No.</td>
</tr>
<tr>
<td>-------------------------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Toxaphene (chlorinated camphene)</td>
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<tr>
<td>2,4-Dinitrotoluene</td>
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<tr>
<td>3,3’-Dimethoxybenzidine</td>
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<tr>
<td>Formaldehyde</td>
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</tr>
<tr>
<td>4,4’-Methylene bis (2-chloroaniline)</td>
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</tr>
<tr>
<td>Acrylonitrile</td>
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</tr>
<tr>
<td>Ethylene dibromide (1,2-Dibromoethane)</td>
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</tr>
<tr>
<td>DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)</td>
<td>72559</td>
</tr>
<tr>
<td>Chlorobenzilate</td>
<td>510156</td>
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<td>Dichlorvos</td>
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<tr>
<td>Vinyl chloride</td>
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<td>Coke Oven Emissions</td>
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<tr>
<td>Ethylene oxide</td>
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<td>Ethylene thiourea</td>
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<td>Vinyl bromide (bromoethene)</td>
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<td>Selenium sulfide (mono and di)</td>
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<td>Pentachlorophenol</td>
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<td>Ethyl carbamate (Urethane)</td>
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<tr>
<td>Ethylene dichloride (1,2-Dichloroethane)</td>
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<tr>
<td>Propylene dichloride (1,2-Dichloropropane)</td>
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<td>Carbon tetrachloride</td>
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<td>Benzene</td>
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<td>Aniline</td>
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<td>1,4-Dichlorobenzene(p)</td>
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<tr>
<td>2,4,6-Trichlorophenol</td>
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</tr>
<tr>
<td>Bis (2-ethylhexyl) phthalate (DEHP)</td>
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<tr>
<td>o-Toluidine</td>
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<td>Propoxur</td>
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<td>1,4-Dioxane (1,4-Diethyleneoxide)</td>
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<td>Bromoform</td>
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<tr>
<td>Captan</td>
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<td>Epichlorohydrin</td>
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<tr>
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<tr>
<td>Dibenz (ah) anthracene</td>
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<tr>
<td>Chrysene</td>
<td>218019</td>
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<tr>
<td>Dimethyl aminoazobenzene</td>
<td>60117</td>
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<tr>
<td>Benzo (a) anthracene</td>
<td>56553</td>
</tr>
<tr>
<td>Benzo (b) fluoranthene</td>
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<tr>
<td>Antimony trioxide</td>
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</tr>
<tr>
<td>Chemical name</td>
<td>CAS No.</td>
</tr>
<tr>
<td>-------------------------------------------</td>
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<tr>
<td>2-Nitropropane</td>
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</tr>
<tr>
<td>1,3-Dichloropropene</td>
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</tr>
<tr>
<td>7, 12-Dimethylbenz(a) anthracene</td>
<td>57976</td>
</tr>
<tr>
<td>Benz(c) acridine</td>
<td>225514</td>
</tr>
<tr>
<td>Indeno(1,2,3-cd)pyrene</td>
<td>193395</td>
</tr>
<tr>
<td>1,2,7,8-Dibenzopyrene</td>
<td>189559</td>
</tr>
</tbody>
</table>

[63 FR 71382, Dec. 28, 1998]

**Table 5 to Subpart JJ of Part 63—List of VHAP of Potential Concern Identified by Industry**

<table>
<thead>
<tr>
<th>CAS No.</th>
<th>Chemical name</th>
<th>EPA de minimis, tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>68122</td>
<td>Dimethyl formamide</td>
<td>1.0</td>
</tr>
<tr>
<td>50000</td>
<td>Formaldehyde</td>
<td>0.2</td>
</tr>
<tr>
<td>75092</td>
<td>Methylene chloride</td>
<td>4.0</td>
</tr>
<tr>
<td>79469</td>
<td>2-Nitropropane</td>
<td>1.0</td>
</tr>
<tr>
<td>78591</td>
<td>Isophorone</td>
<td>0.7</td>
</tr>
<tr>
<td>1000425</td>
<td>Styrene monomer</td>
<td>1.0</td>
</tr>
<tr>
<td>108952</td>
<td>Phenol</td>
<td>0.1</td>
</tr>
<tr>
<td>111422</td>
<td>Dimethanolamine</td>
<td>5.0</td>
</tr>
<tr>
<td>109864</td>
<td>2-Methoxyethanol</td>
<td>10.0</td>
</tr>
<tr>
<td>111159</td>
<td>2-Ethoxyethyl acetate</td>
<td>10.0</td>
</tr>
</tbody>
</table>

[63 FR 71382, Dec. 28, 1998]

**Table 6 to Subpart JJ of Part 63—VHAP of Potential Concern**

<table>
<thead>
<tr>
<th>CAS No.</th>
<th>Chemical name</th>
<th>EPA de minimis, tons/yr*</th>
</tr>
</thead>
<tbody>
<tr>
<td>92671</td>
<td>4-Aminobiphenyl</td>
<td>1.0</td>
</tr>
<tr>
<td>96093</td>
<td>Styrene oxide</td>
<td>1.0</td>
</tr>
<tr>
<td>64675</td>
<td>Diethyl sulfate</td>
<td>1.0</td>
</tr>
<tr>
<td>59892</td>
<td>N-Nitrosomorpholine</td>
<td>1.0</td>
</tr>
<tr>
<td>68122</td>
<td>Dimethyl formamide</td>
<td>1.0</td>
</tr>
<tr>
<td>680319</td>
<td>Hexamethylphosphoramido</td>
<td>0.01</td>
</tr>
<tr>
<td>60355</td>
<td>Acetamide</td>
<td>1.0</td>
</tr>
<tr>
<td>101779</td>
<td>4,4’-Methyleneedianiline</td>
<td>1.0</td>
</tr>
<tr>
<td>90040</td>
<td>o-Anisidine</td>
<td>1.0</td>
</tr>
<tr>
<td>1746016</td>
<td>2,3,7,8-Tetrachlorodibenzop-dioxin</td>
<td>0.00000006</td>
</tr>
<tr>
<td>92875</td>
<td>Benzidine</td>
<td>0.00003</td>
</tr>
<tr>
<td>684935</td>
<td>N-Nitroso-N-methylurea</td>
<td>0.00002</td>
</tr>
<tr>
<td>542881</td>
<td>Bis(chloromethyl) ether</td>
<td>0.00003</td>
</tr>
<tr>
<td>79447</td>
<td>Dimethyl carbamoyl chloride</td>
<td>0.002</td>
</tr>
<tr>
<td>75558</td>
<td>1,2-Propylenimine (2-Methyl aziridine)</td>
<td>0.0003</td>
</tr>
<tr>
<td>57147</td>
<td>1,1-Dimethyl hydrazine</td>
<td>0.0008</td>
</tr>
<tr>
<td>96128</td>
<td>1,2-Dibromo-3-chloropropane</td>
<td>0.001</td>
</tr>
<tr>
<td>CAS No.</td>
<td>Chemical name</td>
<td>EPA de minimis, tons/yr*</td>
</tr>
<tr>
<td>---------</td>
<td>---------------------------------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>62759</td>
<td>N-Nitrosodimethylamine</td>
<td>0.0001</td>
</tr>
<tr>
<td>50328</td>
<td>Benzo (a) pyrene</td>
<td>0.001</td>
</tr>
<tr>
<td>1336363</td>
<td>Polychlorinated biphenyls (Aroclors)</td>
<td>0.0009</td>
</tr>
<tr>
<td>76448</td>
<td>Heptachlor</td>
<td>0.002</td>
</tr>
<tr>
<td>119937</td>
<td>3,3'-Dimethyl benzidine</td>
<td>0.001</td>
</tr>
<tr>
<td>79061</td>
<td>Acrylamide</td>
<td>0.002</td>
</tr>
<tr>
<td>118741</td>
<td>Hexachlorobenzene</td>
<td>0.004</td>
</tr>
<tr>
<td>57749</td>
<td>Chlordane</td>
<td>0.005</td>
</tr>
<tr>
<td>1120714</td>
<td>1,3-Propane sultone</td>
<td>0.003</td>
</tr>
<tr>
<td>106990</td>
<td>1,3-Butadiene</td>
<td>0.007</td>
</tr>
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<td>53963</td>
<td>2-Acetylaminofluorine</td>
<td>0.0005</td>
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<td>91941</td>
<td>3,3'-Dichlorobenzidine</td>
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<tr>
<td>58899</td>
<td>Lindane (hexachlorocyclohexane, gamma)</td>
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<td>95807</td>
<td>2,4-Toluene diamine</td>
<td>0.002</td>
</tr>
<tr>
<td>111444</td>
<td>Dichloroethyl ether (Bis(2-chloroethyl)ether)</td>
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<tr>
<td>122667</td>
<td>1,2—Diphenylhydrazine</td>
<td>0.009</td>
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<tr>
<td>8001352</td>
<td>Toxaphene (chlorinated camphene)</td>
<td>0.006</td>
</tr>
<tr>
<td>121142</td>
<td>2,4-Dinitrotoluene</td>
<td>0.002</td>
</tr>
<tr>
<td>119904</td>
<td>3,3'-Dimethoxybenzidine</td>
<td>0.01</td>
</tr>
<tr>
<td>50000</td>
<td>Formaldehyde</td>
<td>0.2</td>
</tr>
<tr>
<td>101144</td>
<td>4,4'-Methylene bis(2-chloroaniline)</td>
<td>0.02</td>
</tr>
<tr>
<td>107131</td>
<td>Acrylonitrile</td>
<td>0.03</td>
</tr>
<tr>
<td>106934</td>
<td>Ethylene dibromide (1,2-Dibromoethane)</td>
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<td>72559</td>
<td>DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)</td>
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<td>510156</td>
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<td>62737</td>
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<td>Ethylene thiourea</td>
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<td>2,4,6-Trichlorophenol</td>
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<td>Bis (2-ethylhexyl) phthalate (DEHP)</td>
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<td>Chemical name</td>
<td>EPA de minimis, tons/yr*</td>
</tr>
<tr>
<td>---------</td>
<td>-------------------------------------------------------------------------------</td>
<td>--------------------------</td>
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<tr>
<td>114261</td>
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<td>225514</td>
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<td>Indeno(1,2,3-cd)pyrene</td>
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<td>1,2,7,8-Dibenzopyrene</td>
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<td>Pentachloronitrobenzene (Quintobenzene)</td>
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<td>Methyl chloride (Chloromethane)</td>
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<td>1582098</td>
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<td>Cresols/Cresylic acid (isomers and mixture)</td>
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<td>108394</td>
<td>m-Cresol</td>
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<td>Ethylidene dichloride (1,1-Dichloroethane)</td>
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<td>95487</td>
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<td>106445</td>
<td>p-Cresol</td>
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<td>Styrene</td>
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<td>CAS No.</td>
<td>Chemical name</td>
<td>EPA de minimis, tons/yr*</td>
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<tr>
<td>123319</td>
<td>Hydroquinone</td>
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<td>4-Nitrobiphenyl</td>
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<td>Nickel Carbonyl</td>
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<td>60344</td>
<td>Methyl hydrazine</td>
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<td>57578</td>
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<td>2,4—Toluene diisocyanate</td>
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<td>10210681</td>
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<td>79118</td>
<td>Chloroacetic acid</td>
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<td>534521</td>
<td>4,6-Dinitro-o-cresol, and salts</td>
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<td>101688</td>
<td>Methylene diphenyl disocyanate</td>
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<td>108952</td>
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<td>62384</td>
<td>Mercury, (acetato-o) phenyl</td>
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<td>98862</td>
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<td>74839</td>
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</tr>
<tr>
<td>123386</td>
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<td>85449</td>
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</tr>
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<td>463581</td>
<td>Carbonyl sulfide</td>
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<td>100027</td>
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</tr>
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<td>2,2,4-Trimethylpentane</td>
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</tr>
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<td>111422</td>
<td>Diethanolamine</td>
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<td>Hexamethylene-1,6-diisocyanate</td>
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<tr>
<td>CAS No.</td>
<td>Chemical name</td>
<td>EPA de minimis, tons/yr*</td>
</tr>
<tr>
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<td>---------------------------------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td></td>
<td>Glycol ethers&lt;sup&gt;a&lt;/sup&gt;</td>
<td>5.0</td>
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<tr>
<td></td>
<td>Polycyclic organic matter&lt;sup&gt;b&lt;/sup&gt;</td>
<td>0.01</td>
</tr>
</tbody>
</table>

* These values are based on the de minimis levels provided in the proposed rulemaking pursuant to section 112(g) of the Act using a 70-year lifetime exposure duration for all VHAP. Default assumptions and the de minimis values based on inhalation reference doses (RfC) are not changed by this adjustment.

<sup>a</sup> Except for ethylene glycol butyl ether, ethylene glycol ethyl ether (2-ethoxy ethanol), ethylene glycol hexyl ether, ethylene glycol methyl ether (2-methoxyethanol), ethylene glycol phenyl ether, ethylene glycol propyl ether, ethylene glycol mono-2-ethylhexyl ether, diethylene glycol butyl ether, diethylene glycol ethyl ether, diethylene glycol methyl ether, diethylene glycol hexyl ether, diethylene glycol phenyl ether, diethylene glycol propyl ether, triethylene glycol butyl ether, triethylene glycol ethyl ether, triethylene glycol methyl ether, triethylene glycol propyl ether, ethylene glycol butyl ether acetate, ethylene glycol ethyl ether acetate, and diethylene glycol ethyl ether acetate.

<sup>b</sup> Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah) anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

[63 FR 71383, Dec. 28, 1998]
Indiana Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

<table>
<thead>
<tr>
<th>Source Description and Location</th>
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<tbody>
<tr>
<td><strong>Source Name:</strong></td>
</tr>
<tr>
<td><strong>Source Location:</strong></td>
</tr>
<tr>
<td><strong>County:</strong></td>
</tr>
<tr>
<td><strong>SIC Code:</strong></td>
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<tr>
<td><strong>Operation Permit No.:</strong></td>
</tr>
<tr>
<td><strong>Operation Permit Issuance Date:</strong></td>
</tr>
<tr>
<td><strong>Significant Permit Modification No.:</strong></td>
</tr>
<tr>
<td><strong>Permit Reviewer:</strong></td>
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</table>

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. T087-41516-00036 on March 23, 2020. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in LaGrange County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
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<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
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<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
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<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
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<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
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<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
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</table>

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅

LaGrange County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants

LaGrange County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
<th>PM1</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
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<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>142.00</td>
<td>140.92</td>
<td>140.92</td>
<td>0.14</td>
<td>248.092</td>
<td>244.01</td>
<td>56.08</td>
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<td>24.96</td>
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<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
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<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

1 Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."
2 PM2.5 listed is direct PM2.5.
3 Single highest source-wide HAP
4 Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of TV Renewal No. T087-41516-00036, issued on March 23, 2020.

**Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Four Woods Laminating, Inc. on September 9, 2020, relating to making the source major for HAPs and adding the now applicable NESHAP, Subpart JJ.

**Enforcement Issues**

IDEM is aware that there is a pending enforcement action for the source exceeding their HAP's limit and the source being subject to NESHAP JJ due to this exceedance. IDEM is reviewing this matter and will take the appropriate action.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

**Permit Level Determination – Part 70 Modification to an Existing Source**

There are no new emission units or modifications to existing emission units (i.e., no physical change or change in the method of operation occurring at the source) as a result of this modification. See the "Description of Proposed Modification " section above for more detail.

**PTE of the Entire Source After Issuance of the Part 70 Modification**

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^1,$ 2</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>142.0</td>
<td>140.92</td>
<td>140.92</td>
<td>0.14</td>
<td>248.92</td>
<td>244.01</td>
<td>56.08</td>
<td>44.31</td>
<td>63.72</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

$^2$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^3$Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.
This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.

This existing area source of HAP will become a major source of HAP, as defined in 40 CFR 63.2, upon issuance of this modification because HAP emissions will be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

**Federal Rule Applicability Determination**

Due to the modification at this source, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) This wood cabinet and bath door manufacturing plant is subject to the National Emission Standards for Hazardous Air Pollutants for Wood Manufacturing Operations 40 CFR 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14, because it is a wood furniture manufacturing operation that is located at a source which is major for HAPs. The compliance date for this source is one year after issuance of the permit.

The surface coating units at this wood cabinet and bath door manufacturing plant are subject to the following portions of Subpart JJ:

- (1) 40 CFR 63.800 (a), (c)-(e), (h)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802 (b), (c)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (d), (e), (f), (g)
- (6) 40 CFR 63.805 (a)
- (7) 40 CFR 63.806 (a)-(c), (e), (h)-(j)
- (8) 40 CFR 63.807 (a)-(c), (e)
- (9) 40 CFR 63.808

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart JJ.

(b) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed modification.

**Compliance Assurance Monitoring (CAM):**

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

- (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the units as part of this modification.

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Due to this modification, state rule applicability has been reviewed as follows:</td>
</tr>
</tbody>
</table>

326 IAC 2-2 (PSD)
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the Part 70 Modification section

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this stationary wood cabinet and bath door manufacturing plant will emit equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to this stationary wood cabinet and bath door manufacturing plant. However, pursuant to 326 IAC 2-4.1-1(b)(2), because this stationary wood cabinet and bath door manufacturing plant is specifically regulated under NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, this stationary wood cabinet and bath door manufacturing plant is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.
326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved and unpaved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Lagrange County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Lagrange County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Lagrange County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

Compliance Determination and Monitoring Requirements
There are no new or modified compliance requirements included with this modification.

Proposed Changes
As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as strikethrough text and new language appears as bold text (these changes may include Title I changes):

1. Condition D.1.2 has been removed from the permit and the following D.1 sections have been renumbered.
2. Condition E.4 was added to the permit.
3. The quarterly report forms for HAP limits have been deleted.

D.1.2 Hazardous Air Pollutants (HAPs) Limit [40 CFR 63] [326 IAC 20]
In order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

(a) The input of any single HAP delivered to the coating applicators in the three (3) surface coating booths (Booths 1, 2, and 4), the four (4) stain machines (S1, S1, S2, and S3), and the one (1) surface coating flat line (FL1) shall not exceed 9.50 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month. The amount of single HAP in waste shipped offsite may be deducted from the reported monthly single HAP input.
(b) The input of any combination of HAPs delivered to the coating applicators in the three (3) surface coating booths (Booths 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1) shall not exceed 21.00 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month. The amount of combined HAP in waste shipped offsite may be deducted from the reported combined HAP input.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.1.32 Volatile Organic Compounds (VOC) [326 IAC 8-2-12][326 IAC 8-1-6]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in Booths 2 and 4, Stain Machines S11, S1, S2, and S3, and surface coating line FL1, and pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and F087-8992-00036, issued on January 12, 1999, in Booth 1, the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) of the following application methods:

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

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

D.1.43 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) surface coating booths, four (4) stain machines, and surface coating flat line FL1 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

D.1.54 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.65 Volatile Organic Compounds (VOC) and HAP [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC and HAP input limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
(b) If the amount of VOC and HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC and HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC and HAP containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit 087-40306-00036.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(E) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC and HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC and HAP in the waste.
(3) Minimum Assumed VOC and HAP content: The VOC and HAP content of the waste shipped offsite may be assumed to be equal to the VOC and HAP content of the material with the lowest VOC and HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC and HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC and HAP containing waste stream and conduct an analysis for VOC and HAP content.

(d) Compliance with the VOC input limitations contained in Condition D.1.1 (a) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.

(e) Compliance with the single HAP input limitation contained in Condition D.1.2 (a) shall be demonstrated within 30 days of the end of each month. This shall be based on the single HAP input for the previous month, minus the amount single HAP in the waste shipped out for recycling or disposal, and adding it to previous 11 months total single HAP input, minus the amount single HAP in the waste shipped out for recycling or disposal, so as to arrive at single HAP input for the most recent twelve (12) consecutive month period.

(f) Compliance with the combined HAP input limitation contained in Condition D.1.2 (b) shall be demonstrated within 30 days of the end of each month. This shall be based on the combined HAP input for the previous month, minus the amount combined HAP in the waste shipped out for recycling or disposal, and adding it to previous 11 months total combined HAP input, minus the amount combined HAP in the waste shipped out for recycling or disposal, so as to arrive at combined HAP input for the most recent twelve (12) consecutive month period.

(g) The VOC input for a month shall be calculated using the following equation:

\[ \text{VOC input} = \text{SCL} - \text{SR} \]

Where:

- \( \text{SCL} \): The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

- \( \text{SR} \): The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

(h) The single HAP input for a month shall be calculated using the following equation:

\[ \text{single HAP input} = \text{ISH} - \text{RSH} \]

Where:
ISH = The total amount of single HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

RSH = The total amount of single HAP, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

The combined HAPs input for a month shall be calculated using the following equation:

\[
\text{combined HAPs input} = \text{ICH} - \text{RCH}
\]

Where:

ICH = The total amount of combined HAPs, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

RCH = The total amount of combined HAPs, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

D.1.76 NOx Emission Determination

Compliance with Condition D.1.1(b) shall be determined by calculating the NOx emissions associated with the two (2) natural gas-fired generators (NGG1 and NGG2) and two (2) diesel-fired generators (Engine 1 and Engine 2) as follows:

The NOx emissions shall be determined by the following equation:

\[
\text{NOx emissions} = \frac{\left[\text{Ef1} \times (Y_1 + Y_2) \right] \times 1\text{ ton}}{2,000\text{lbs}} + \frac{\left[\text{Ef2} \times (Y_3 + Y_4) \right] \times 1\text{ ton}}{2,000\text{lbs}}
\]

Where:

\[
\begin{align*}
\text{Ef1} & = 17.4\text{ lb/hr, NOx emissions for diesel-fired generators} \\
\text{Ef2} & = 4161.6\text{ lb/MMCF, NOx emissions for natural gas-fired generators} \\
Y_1 & = \text{No. of hours of operation per month for Engine 1, hrs/month} \\
Y_2 & = \text{No. of hours of operation per month for Engine 2, hrs/month} \\
Y_3 & = \text{Million cubic feet of natural gas used per month in NGG1, MMCF/month} \\
Y_4 & = \text{Million cubic feet of natural gas used per month in NGG2, MMCF/month}
\end{align*}
\]

D.1.87 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 stacks exhausting from Booths 1, 2, and 4, Stain Machines S11, S1, S2, and S3, and surface coating flat line FL1 while one or more of the units are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.98 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 (a) and D.1.2, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.1(a) and D.1.2, and to document the quantity of any VOC and HAP shipped offsite and deducted from the total reported VOC and HAP usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (a) of Condition D.1.1, then the following records shall be maintained:

(A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.

(C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.

(5) If the amount of single HAP in waste material is being deducted from the single HAP input as allowed in paragraph (a) of Condition D.1.2, then the following records shall be maintained:

(A) The amount of single HAP containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
(B) The single HAP content of the waste and all records necessary to verify the amount and single HAP content of the single HAP containing waste shipped out for recycling or disposal.

(C) The weight of single HAP input, minus the weight of single HAP shipped out to be recycled or disposed, for each compliance period.

(6) If the amount of combined HAP in waste material is being deducted from the combined HAP input as allowed in paragraph (b) of Condition D.1.2, then the following records shall be maintained:

(A) The amount of combined HAP containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The combined HAP content of the waste and all records necessary to verify the amount and combined HAP content of the combined HAP containing waste shipped out for recycling or disposal.

(C) The weight of combined HAP input, minus the weight of combined HAP shipped out to be recycled or disposed, for each compliance period.

(75) The total VOC and total single and combined HAP input for each month.

(86) The total VOC and total single and combined HAP input for each compliance period.

(b) To document the compliance status with Condition D.1.87, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections;

(c) To document the compliance status with Conditions D.1.1 (b), the Permittee shall maintain monthly records of the hours of operation for Engines 1 and 2, and the total NOx emissions from NGG1, NGG2, Engine 1 and Engine 2; and

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.409 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1 (a) (b) and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 3826 IAC 2-7-1(35).
Emissions Unit Description:

(a) One (1) surface coating booth, identified as Booth 1, constructed in 1985, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(b) One (1) surface coating booth, identified as Booth 2, constructed in 1994, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 2;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(c) One (1) surface coating booth, identified as Booth 4, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 4;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(d) One (1) stain machine, identified as S11, constructed in 2012, with a maximum capacity of 945 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack S11;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(e) One (1) stain machine, identified as S1, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(f) One (1) stain machine, identified as S2, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S2;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(g) One (1) stain machine, identified as S3, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S3;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(h) One (1) surface coating flat line, identified as FL1, constructed in 2018, with a maximum capacity of 800 units per hour, using dry filters as control, and exhausting to stack FLSV1;

Under 40 CFR 63, Subpart JJ, this unit is considered a new affected source.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251


The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-14:

(1) 40 CFR 63.800 (a), (c)-(e), (h)
(2) 40 CFR 63.801
(3) 40 CFR 63.802 (b), (c)
(4) 40 CFR 63.803
(5) 40 CFR 63.804 (d), (e), (f), (g)
(6) 40 CFR 63.805 (a)
(7) 40 CFR 63.806 (a)-(c), (e), (h)-(j)
(8) 40 CFR 63.807 (a)-(c), (e)
(9) 40 CFR 63.808

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc. - Plant 1
Source Address: 7550 W. 500 S., Topeka, Indiana 46571
Part 70 Permit No.: T087-43236-00036
Facility: Three (3) surface coating booths (Booths 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1)
Parameter: Highest Single HAP Input
Limit: Total input of any single HAP delivered to the coating applicators at the three (3) surface coating booths (Booth 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1) shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of single HAP in waste shipped offsite may be deducted from the reported monthly single HAP input.
<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 (tons)</th>
<th>Previous 11 Months (tons)</th>
<th>Column 1 + Column 2 (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous 11 Months</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 Month Total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **No deviation occurred in this quarter.**
- **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 QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  

**Part 70 Quarterly Report**

**Source Name:** Four Woods Laminating, Inc. - Plant 1  
**Source Address:** 7550 W. 500 S., Topeka, Indiana 46571  
**Part 70 Permit No.:** T087-43236-00036  
**Facility:** Three (3) surface coating booths (Booths 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1)  
**Parameter:** Total HAP Input  
**Limit:** Total input of HAPs delivered to the coating applicators at the three (3) surface coating booths (Booth 1, 2, and 4), the four (4) stain machines (S11, S1, S2, and S3), and the one (1) surface coating flat line (FL1) shall not exceed 21.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of single HAP in waste shipped offsite may be deducted from the reported monthly single HAP input.
<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 (tons)</th>
<th>Column 2 (tons)</th>
<th>Column 1 + Column 2 (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous 11 Months</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 Month Total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation(s) occurred in this quarter.

☐ Deviation has been reported on:

Submitted by: ________________________________
Title / Position: ____________________________
Signature: __________________________________
Date: ______________________________________
Phone: _____________________________________

**Conclusion and Recommendation**

Unless otherwise stated, information 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 September 9, 2020.

The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 087-43236-00036.

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved.
(a) If you have any questions regarding this permit, please contact William Altman, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-9664 or (800) 451-6027, and ask for William Altman or (317) 233-9664.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Emission Calculations

#### Emissions Summary

**Company Name:** Four Woods Laminating, Inc. – Plant 1  
**Source Address:** 7550 W. 500 South, Topeka, IN 46571  
**Operating Permit Number:** 7987-41516-00036  
**SPM Number:** 087-43236-00036  
**Reviewer:** William Altman

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (Xylene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booths &amp; Stain Machines</td>
<td>124.64</td>
<td>124.64</td>
<td>124.64</td>
<td>-</td>
<td>-</td>
<td>8,966</td>
<td>-</td>
<td>48.34</td>
<td>44.30 Xylene</td>
</tr>
<tr>
<td>Surface Coating Flat Line</td>
<td>8.73</td>
<td>8.73</td>
<td>8.73</td>
<td>-</td>
<td>-</td>
<td>113.96</td>
<td>-</td>
<td>11.42</td>
<td>9.17 Toluene</td>
</tr>
<tr>
<td>Diesel-Fired Generators (Engine 1, Engine 2)</td>
<td>4.45</td>
<td>2.55</td>
<td>2.55</td>
<td>7.71E-02</td>
<td>4.48</td>
<td>34.93</td>
<td>0.07</td>
<td>3.4E-02 Benzene</td>
<td></td>
</tr>
<tr>
<td>Woodworking Operation**</td>
<td>40.821</td>
<td>40.821</td>
<td>40.821</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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</tr>
<tr>
<td>Natural Gas-Fired Generators (NGG1, NGG2)</td>
<td>0.004</td>
<td>0.51</td>
<td>0.51</td>
<td>0.03</td>
<td>209.08</td>
<td>6.05</td>
<td>16.24</td>
<td>3.67</td>
<td>9.4E-03 Xylene</td>
</tr>
<tr>
<td>Natural Gas-Fired Generator (NGG3)</td>
<td>0.000</td>
<td>0.016</td>
<td>0.016</td>
<td>0.001</td>
<td>6.701</td>
<td>0.194</td>
<td>0.521</td>
<td>0.12</td>
<td>8.7E-02 Formaldehyde</td>
</tr>
<tr>
<td>Natural Gas-Fired Units</td>
<td>0.10</td>
<td>0.40</td>
<td>0.40</td>
<td>0.03</td>
<td>5.22</td>
<td>0.29</td>
<td>4.38</td>
<td>0.10</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>40,959</td>
<td>40,958</td>
<td>40,958</td>
<td>0.14</td>
<td>373.43</td>
<td>9,091</td>
<td>56.08</td>
<td>63.72</td>
<td>44.31 Xylene</td>
</tr>
</tbody>
</table>

**Paved Roads:** 9.91E-03 1.98E-03 4.86E-04 - - - - - - - - - -

**Unpaved Roads:** 9.10E-02 2.42E-02 2.42E-03 - - - - - - - - - -

**Total Fugitive Emissions:** 1.01E-01 2.26E-02 2.91E-03 - - - - - - - - - -

**PM<sub>2.5</sub>** is listed as direct PM<sub>2.5</sub>.

**In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garretson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the woodworking operation were calculated after consideration of the controls for purposes of determining permit level and the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).**

Note: The gray shaded cells indicate where limits are included. See TSD for details.
### Appendix A: Emission Calculations

#### Hazardous Air Pollutants (HAP) Emissions Summary

**Company Name:** Four Woods Laminating, Inc. – Plant 1  
**Source Address:** 7550 W. 500 South, Topeka, IN 46571  
**Operating Permit Number:** 7087-41516-00036  
**SPM Number:** 087-43236-00036  
**Reviewer:** William Altman

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>Benzene</th>
<th>Xylene</th>
<th>Ethylene</th>
<th>Toluene</th>
<th>Cumene</th>
<th>Ethylbenzene</th>
<th>Methanol</th>
<th>Naphthalene</th>
<th>Formaldehyde</th>
<th>Acetaldehyde</th>
<th>Acrolein</th>
<th>Biphenyl</th>
<th>1,3-Butadiene</th>
<th>2,4-Trimethylpentane</th>
<th>Hexane</th>
<th>Dichlorobenzene</th>
<th>HAPs - Metal</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booths &amp; Stain Machines*</td>
<td>44.30</td>
<td>4.04</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surface Coating Flat Liner</td>
<td>0.49</td>
<td>9.17</td>
<td>0.04</td>
<td>0.14</td>
<td>1.56</td>
<td>0.02</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Diesel-Fired Generators</td>
<td>3.45E-02</td>
<td>8.58E-03</td>
<td>1.25E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>3.51E-03</td>
<td>1.12E-03</td>
<td>3.50E-04</td>
<td>9.42E-03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>-</td>
<td>48.34</td>
</tr>
<tr>
<td>Natural Gas-Fired Generator NGG1</td>
<td>1.13E-02</td>
<td>4.71E-03</td>
<td>1.05E-02</td>
<td>0.06</td>
<td>-</td>
<td>1.35</td>
<td>0.21</td>
<td>1.03</td>
<td>5.43E-03</td>
<td>6.84E-03</td>
<td>6.41E-03</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>-</td>
<td>1.94</td>
</tr>
<tr>
<td>Natural Gas-Fired Generator NGG2</td>
<td>1.13E-02</td>
<td>4.71E-03</td>
<td>1.05E-02</td>
<td>0.06</td>
<td>1.35</td>
<td>0.21</td>
<td>0.13</td>
<td>5.43E-03</td>
<td>6.84E-03</td>
<td>6.41E-03</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>-</td>
<td>1.84</td>
</tr>
<tr>
<td>NG Combustion</td>
<td>1.10E-04</td>
<td>-</td>
<td>-</td>
<td>1.77E-04</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>3.91E-03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.09</td>
<td>2.86E-04</td>
<td></td>
<td>0.10</td>
<td></td>
</tr>
<tr>
<td>Woodworking Operation</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>-</td>
<td>-</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>-</td>
<td>0.00</td>
</tr>
<tr>
<td>Natural Gas-Fired Generator NGG3</td>
<td>7.23E-04</td>
<td>3.02E-04</td>
<td>6.75E-04</td>
<td>4.11E-03</td>
<td>-</td>
<td>8.67E-02</td>
<td>1.37E-02</td>
<td>0.09E+00</td>
<td>3.48E-04</td>
<td>0.08E+00</td>
<td>0.08E+00</td>
<td>1.81E-03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>-</td>
<td>0.11</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>0.06</td>
<td>44.81</td>
<td>4.04</td>
<td>9.20</td>
<td>0.04</td>
<td>0.14</td>
<td>1.69</td>
<td>0.02</td>
<td>2.71</td>
<td>0.43</td>
<td>0.26</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>0.13</td>
<td>6.26E-05</td>
<td>2.86E-04</td>
<td>63.71</td>
</tr>
</tbody>
</table>

* In order to render the source an area source of HAP emissions under section 112 of the Clean Air Act, the total input of any single HAP to the coating applicators shall not exceed 9.50 tons per twelve (12) consecutive month period; and the total input of total HAPs to the surface coating applicators shall not exceed 22.04 tons per twelve (12) consecutive month period.
Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines

Company Name: Four Woods Laminating, Inc. – Plant 1
Source Address: 7550 W. 500 South, Topeka, IN 46571
Operating Permit Number: T087-41516-00036
SPM Number: 067-43236-00036
Reviewer: William Altman

| Maximum Output Horsepower Rating (hp) | 50 |
| Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr) | 7500 |
| Maximum Hours Operated per Year (hr/yr) | 8760 |
| Potential Fuel Usage (MMBtu/yr) | 3285 |
| High Heat Value (MMBtu/MMscf) | 1020 |
| Potential Fuel Usage (MMcf/yr) | 3.22 |

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMBtu)</td>
<td>7.71E-05</td>
<td>9.99E-03</td>
<td>9.99E-03</td>
<td>5.88E-04</td>
<td>4.08E+00</td>
<td>1.18E-01</td>
<td>3.17E-01</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr)</td>
<td>0.0001</td>
<td>0.02</td>
<td>0.02</td>
<td>0.001</td>
<td>6.70</td>
<td>0.19</td>
<td>0.52</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>8.36E-03</td>
<td>0.014</td>
</tr>
<tr>
<td>Acrolein</td>
<td>5.14E-03</td>
<td>0.008</td>
</tr>
<tr>
<td>Benzene</td>
<td>4.40E-04</td>
<td>0.001</td>
</tr>
<tr>
<td>Biphenyl</td>
<td>2.12E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>2.67E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>5.28E-02</td>
<td>0.087</td>
</tr>
<tr>
<td>Methanol</td>
<td>2.50E-03</td>
<td>0.004</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.10E-03</td>
<td>0.002</td>
</tr>
<tr>
<td>Toluene</td>
<td>4.08E-04</td>
<td>0.001</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>2.50E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.84E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>0.12</td>
</tr>
</tbody>
</table>

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology
Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2
Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]
Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]
## Appendix A: Federal Potential Emissions Calculations

### VOC and Particulate From Surface Coating Operations

**Company Name:** Four Woods Laminating, Inc. – Plant 1  
**Source Address:** 7550 W. 500 South, Topeka, IN 46571  
**Operating Permit Number:** T087-41516-00036  
**SPM Number:** 087-43236-00036  
**Reviewer:** William Altman

---

### METHODOLOGY

**Pounds of VOC per Gallon Coating less Water:**

\[
\text{Pounds of VOC per Gallon Coating less Water} = \frac{\text{Density (lb/gal) \times Weight % Organics}}{(1-Volume \% \text{ water})}
\]

**Pounds of VOC per Gallon Coating:**

\[
\text{Pounds of VOC per Gallon Coating} = \frac{\text{Density (lb/gal) \times Weight % Organics}}{}
\]

**Potential VOC Pounds per Hour:**

\[
\text{Potential VOC Pounds per Hour} = \text{Pounds of VOC per Gallon Coating (lb/gal) \times Gal of Material (gal/unit) \times Maximum (units/hr)}
\]

**Potential VOC Pounds per Day:**

\[
\text{Potential VOC Pounds per Day} = \text{Potential VOC Pounds per Hour \times 24 hr/day}
\]

**Potential VOC Tons per Year:**

\[
\text{Potential VOC Tons per Year} = \text{Potential VOC Pounds per Day \times 8760 hrs/yr \times 1 ton/2000 lbs}
\]

**Particulate Potential Tons per Year:**

\[
\text{Particulate Potential Tons per Year} = \text{(units/hour) \times (gal/unit) \times (lbs/gal) \times (1-Weight % Volatiles) \times (1-Transfer efficiency) \times (8760 hrs/yr) \times 1 ton/2000 lbs}
\]

**Total Potential = Worst Coating + Sum of all solvents used**

### Hazardous Air Pollutants (HAPs)

**HAPs emission rate (tons/yr):**

\[
\text{HAPs emission rate (tons/yr)} = \frac{\text{Density (lb/gal) \times Gal of Material (gal/unit) \times Maximum (units/hr) \times Weight % HAP \times 8760 hrs/yr \times 1 ton/2000 lbs}}{}
\]

### Table - Federal Potential Emissions Calculations

<table>
<thead>
<tr>
<th>Unit</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Vol (solids)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Uncontrolled Particulate Potential tons per year</th>
<th>Partially Controlled Vapors</th>
<th>Controlled Particulate Potential tons per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Booth 1</td>
<td>Facett 50</td>
<td>7.76</td>
<td>66.69%</td>
<td>0.00%</td>
<td>66.69%</td>
<td>0.00%</td>
<td>14.36%</td>
<td>0.13</td>
<td>27.5</td>
<td>5.19</td>
<td>6.19</td>
<td>35.29</td>
<td>607.05</td>
<td>118.4</td>
<td>13.83</td>
<td>35.78</td>
<td>75%</td>
</tr>
<tr>
<td>Booth 2</td>
<td>Dutch Sunset</td>
<td>9.84</td>
<td>8.80%</td>
<td>0.00%</td>
<td>8.80%</td>
<td>0.00%</td>
<td>25.93%</td>
<td>0.05</td>
<td>37.5</td>
<td>5.19</td>
<td>6.19</td>
<td>35.29</td>
<td>607.05</td>
<td>118.4</td>
<td>13.83</td>
<td>35.78</td>
<td>75%</td>
</tr>
<tr>
<td>Booth 4</td>
<td>Facett 50</td>
<td>7.76</td>
<td>66.69%</td>
<td>0.00%</td>
<td>66.69%</td>
<td>0.00%</td>
<td>14.36%</td>
<td>0.13</td>
<td>62.5</td>
<td>5.19</td>
<td>6.19</td>
<td>35.29</td>
<td>607.05</td>
<td>118.4</td>
<td>13.83</td>
<td>35.78</td>
<td>75%</td>
</tr>
<tr>
<td>Stain Machine S11</td>
<td>NS5162078</td>
<td>6.8</td>
<td>98.90%</td>
<td>0.00%</td>
<td>98.90%</td>
<td>0.00%</td>
<td>1.70%</td>
<td>0.02</td>
<td>945</td>
<td>5.19</td>
<td>6.19</td>
<td>35.29</td>
<td>607.05</td>
<td>118.4</td>
<td>13.83</td>
<td>35.78</td>
<td>75%</td>
</tr>
<tr>
<td>Stain Machine S2</td>
<td>NS5162078</td>
<td>6.8</td>
<td>98.90%</td>
<td>0.00%</td>
<td>98.90%</td>
<td>0.00%</td>
<td>1.70%</td>
<td>0.02</td>
<td>945</td>
<td>5.19</td>
<td>6.19</td>
<td>35.29</td>
<td>607.05</td>
<td>118.4</td>
<td>13.83</td>
<td>35.78</td>
<td>75%</td>
</tr>
<tr>
<td>Stain Machine S3</td>
<td>NS5162078</td>
<td>6.8</td>
<td>98.90%</td>
<td>0.00%</td>
<td>98.90%</td>
<td>0.00%</td>
<td>1.70%</td>
<td>0.02</td>
<td>945</td>
<td>5.19</td>
<td>6.19</td>
<td>35.29</td>
<td>607.05</td>
<td>118.4</td>
<td>13.83</td>
<td>35.78</td>
<td>75%</td>
</tr>
</tbody>
</table>

**Booths 1 and 2:**

- **Xylene:** 10.00%  
- **Ethylene Glycol:** 0.00%  

**Booth 4:**

- **Xylene:** 10.00%  
- **Ethylene Glycol:** 0.00%  

**Stain Machines S11, S1, and S2:**

- **Xylene:** 10.00%  
- **Ethylene Glycol:** 0.00%  

**TOTALS:**

- **Xylene:** 40.40 tons/yr  
- **Ethylene Glycol:** 4.04 tons/yr  

**Effectiveness of Control:**

- **Booths 1 and 2:**
  - **Xylene:** 75%  
  - **Ethylene Glycol:** 95%  

- **Booth 4:**
  - **Xylene:** 75%  
  - **Ethylene Glycol:** 95%  

**Particulate Emissions:**

- **Booths 1 and 2:**
  - **Xylene:** 0.00%  
  - **Ethylene Glycol:** 0.00%  

- **Booth 4:**
  - **Xylene:** 0.00%  
  - **Ethylene Glycol:** 0.00%  

**TOTALS:**

- **Xylene:** 0.00%  
- **Ethylene Glycol:** 0.00%  

**Hazardous Air Pollutants (HAPs):**

- **Booths 1 and 2:**
  - **Xylene:** 0.00%  
  - **Ethylene Glycol:** 0.00%  

- **Booth 4:**
  - **Xylene:** 0.00%  
  - **Ethylene Glycol:** 0.00%  

**TOTALS:**

- **Xylene:** 0.00%  
- **Ethylene Glycol:** 0.00%  

**HAPs emission rate (tons/yr):**

- **Booths 1 and 2:**
  - **Xylene:** 44.30 tons/yr  
  - **Ethylene Glycol:** 4.04 tons/yr  

- **Booth 4:**
  - **Xylene:** 48.34 tons/yr  
  - **Ethylene Glycol:** 4.04 tons/yr  

**Effectiveness of Control:**

- **Booths 1 and 2:**
  - **Xylene:** 75%  
  - **Ethylene Glycol:** 95%  

- **Booth 4:**
  - **Xylene:** 75%  
  - **Ethylene Glycol:** 95%  

**Particulate Emissions:**

- **Booths 1 and 2:**
  - **Xylene:** 0.00%  
  - **Ethylene Glycol:** 0.00%  

- **Booth 4:**
  - **Xylene:** 0.00%  
  - **Ethylene Glycol:** 0.00%  

**TOTALS:**

- **Xylene:** 0.00%  
- **Ethylene Glycol:** 0.00%
### Appendix A: Emissions Calculations
#### VOC and Particulate

**From Surface Coating Flat Line (FL1)**

**Company Name:** Four Woods Laminating, Inc. – Plant 1  
**Source Address:** 7550 W. 500 South, Topeka, IN 46571  
**Operating Permit Number:** T087-41516-00036  
**SPM Number:** 087-43236-00036  
**Reviewer:** William Altman

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatiles (H2O &amp; Organics)</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Weight % Non-Volatiles (solids)</th>
<th>Volume % Non-Volatiles</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (units/hour)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating less water per hour</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Uncontrolled Particulate Potential (ton/yr)</th>
<th>Controlled Particulate Potential (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glaze</td>
<td>8.05</td>
<td>65.93%</td>
<td>2.06%</td>
<td>19.80%</td>
<td>0.00625</td>
<td>800.0</td>
<td>5.25</td>
<td>5.14</td>
<td>25.71</td>
<td>617.68</td>
<td>112.62</td>
<td>25.97</td>
<td>75%</td>
<td>8.73</td>
<td>95%</td>
<td>0.44</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wash Thinner</td>
<td>6.91</td>
<td>100.00%</td>
<td>30.91%</td>
<td>69.09%</td>
<td>0.00008</td>
<td>800.0</td>
<td>6.91</td>
<td>4.77</td>
<td>0.31</td>
<td>7.33</td>
<td>1.34</td>
<td>4.77</td>
<td>75%</td>
<td>0.90</td>
<td>95%</td>
<td>0.06</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total Potential to Emit**  
Add worst case coating to all solvents  

<p>| | | | | | | | | | | | | | | | | | | |</p>
<table>
<thead>
<tr>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>26.02</td>
<td>624.41</td>
<td>113.96</td>
<td>8.73</td>
<td>0.44</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**METHODOLOGY**

- **Pounds of VOC per Gallon Coating less Water** = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- **Pounds of VOC per Gallon Coating** = (Density (lb/gal) * Weight % Organics)
- **Potential VOC Pounds per Hour** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hriday)
- **Potential VOC Tons per Year** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
- **Particulate Potential Tons per Year** = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
- **Pounds VOC per Gallon of Solids** = (Density (lbs/gal) / Weight % organics) / (Volume % solids)
- **Total** = Worst Coating + Sum of all solvents used
<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Glaze</td>
<td>8.05</td>
<td>0.00625</td>
<td>800.0</td>
<td>0.28%</td>
<td>5.14%</td>
<td>0.02%</td>
<td>0.08%</td>
<td>0.25%</td>
<td>0.01%</td>
<td>0.49</td>
<td>9.96</td>
<td>0.04</td>
<td>0.09</td>
<td>0.02</td>
<td>0.05</td>
<td>11.42</td>
</tr>
<tr>
<td>Wash Thinner</td>
<td>6.91</td>
<td>0.00008</td>
<td>800.0</td>
<td>0.00%</td>
<td>5.44%</td>
<td>0.08%</td>
<td>0.01%</td>
<td>3.41%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.11</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.17</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**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

Total Potential Emissions: 0.49 9.17 0.04 0.14 1.56 0.02 11.42
Appendix A: Emission Calculations
Large Reciprocating Internal Combustion Engines - Diesel Fuel
Emergency Generators
Output Rating (>600 HP)
Maximum Input Rate (>4.2 MMBtu/hr)

Company Name: Four Woods Laminating, Inc. – Plant 1
Source Address: 7550 W. 500 South, Topeka, IN 46571
Operating Permit Number: T087-41516-00036
SPM Number: 087-43236-00036
Reviewer: William Altman

Emissions calculated based on output rating (hp)

<table>
<thead>
<tr>
<th>Engine 1, Engine 2 Rating (hp)</th>
<th>725.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Horsepower Rating (hp)</td>
<td>1450.0</td>
</tr>
<tr>
<td>Maximum Hours Operated per Year</td>
<td>8760</td>
</tr>
<tr>
<td>Potential Throughput (hp-hr/yr)</td>
<td>12,702,000</td>
</tr>
<tr>
<td>Sulfur Content (S) of Fuel (% by weight)</td>
<td>0.0015</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/hp-hr</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>7.00E-04</td>
<td>4.45</td>
</tr>
<tr>
<td>PM10*</td>
<td>4.01E-04</td>
<td>2.55</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>4.01E-04</td>
<td>2.55</td>
</tr>
<tr>
<td>SO2</td>
<td>1.21E-05</td>
<td>0.08</td>
</tr>
<tr>
<td>NOx</td>
<td>2.40E-02</td>
<td>152.42</td>
</tr>
<tr>
<td>VOC</td>
<td>7.05E-04</td>
<td>4.48</td>
</tr>
<tr>
<td>CO</td>
<td>5.50E-03</td>
<td>34.93</td>
</tr>
</tbody>
</table>

**PM10 emission factor in lb/hp-hr was calculated using the emission factor in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Tables 3.3-1 and 3.4-1).**

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Hazardous Air Pollutants (HAPs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>Emission Factor in lb/hp-hr****</td>
</tr>
<tr>
<td>Toluene</td>
<td>5.43E-06</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.97E-06</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>1.35E-06</td>
</tr>
<tr>
<td>Acetaldehyde</td>
<td>5.52E-07</td>
</tr>
<tr>
<td>Acrolein</td>
<td>1.76E-07</td>
</tr>
<tr>
<td>Total PAH HAPs***</td>
<td>5.52E-08</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.45E-02</td>
</tr>
</tbody>
</table>

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Tables 3.3-1 and 3.4-1).

**Potential Emission of Total HAPs (tons/yr)** 7.00E-02

Methodology
Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4.
Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]
Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]
### Appendix A: Emission Calculations
#### Woodworking Operations

**Company Name:** Four Woods Laminating, Inc. – Plant 1  
**Source Address:** 7550 W. 500 South, Topeka, IN 46571  
**Operating Permit Number:** T087-41516-00036  
**SPM Number:** 087-43236-00036  
**Reviewer:** William Altman

#### PTE of PM/PM10/PM2.5

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Outlet Grain Loading per Cubic Foot of Outlet Air (grains/acfm)</th>
<th>Flow Rate (acfm)</th>
<th>PM/PM10/PM2.5 Emission Rate before Controls (lb/hr)</th>
<th>PM/PM10/PM2.5 Emission Rate before Controls (tons/yr)</th>
<th>Control Efficiency</th>
<th>PM/PM10/PM2.5 Emission Rate after Controls (lb/hr)</th>
<th>PM/PM10/PM2.5 Emission Rate after Controls (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>BH1</td>
<td>0.004</td>
<td>12,675</td>
<td>4,346</td>
<td>19,034</td>
<td>99.99%</td>
<td>0.43</td>
<td>1.90</td>
</tr>
<tr>
<td>BH2</td>
<td>0.00167</td>
<td>34,750</td>
<td>4,974</td>
<td>21,787</td>
<td>99.95%</td>
<td>0.50</td>
<td>2.18</td>
</tr>
<tr>
<td><strong>PM/PM10/PM2.5 Totals:</strong></td>
<td></td>
<td></td>
<td>9,320</td>
<td>40,821</td>
<td></td>
<td>0.93</td>
<td>4.08</td>
</tr>
</tbody>
</table>

**Methodology**

Emission Rate in lbs/hr (after controls) = (grains/acfm) (acfm) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

#### 326 IAC 6-3-2 Allowable PM Emission Rate

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Process Weight Rate (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)</th>
<th>Uncontrolled PTE PM (lbs/hr)</th>
<th>Controlled PTE PM (lbs/hr)</th>
<th>Is a Control Device Needed to Comply with 326 IAC 6-3-2?</th>
</tr>
</thead>
<tbody>
<tr>
<td>BH1 and BH2</td>
<td>937</td>
<td>0.4685</td>
<td>2.47</td>
<td>9,320</td>
<td>0.93</td>
<td>YES</td>
</tr>
</tbody>
</table>

**Methodology:**

326 IAC 6-3-2 Allowable PM Emission Rate = 4.10 * [Process Weight Rate (tons/hr)]^0.67
Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines
Generator NGG1

Company Name: Four Woods Laminating, Inc. – Plant 1
Source Address: 7550 W. 500 South, Topeka, IN 46571
Operating Permit Number: T087-41516-00036
SPM Number: 087-43236-00036
Reviewer: William Altman

Maximum Output Horsepower Rating (hp) 780
Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr) 7500
Maximum Hours Operated per Year (hr/yr) 8760
Potential Fuel Usage (MMBtu/yr) 51246
High Heat Value (MMBtu/MMscf) 1020
Potential Fuel Usage (MMcf/yr) 50.24

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Criteria Pollutants</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>7.71E-05</td>
<td>0.26</td>
<td>0.0020</td>
</tr>
<tr>
<td>PM10*</td>
<td>9.99E-03</td>
<td>0.26</td>
<td>0.015</td>
</tr>
<tr>
<td>PM2.5*</td>
<td>9.99E-03</td>
<td>0.26</td>
<td>0.015</td>
</tr>
<tr>
<td>SO2</td>
<td>5.88E-04</td>
<td>10.54</td>
<td>3.02</td>
</tr>
<tr>
<td>NOx</td>
<td>4.08E+00</td>
<td>3.17E-01</td>
<td>8.12</td>
</tr>
<tr>
<td>VOC</td>
<td>1.18E-01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td>3.17E-01</td>
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<td></td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>8.36E-03</td>
<td>0.214</td>
</tr>
<tr>
<td>Acrolein</td>
<td>5.14E-03</td>
<td>0.132</td>
</tr>
<tr>
<td>Benzene</td>
<td>4.40E-04</td>
<td>0.011</td>
</tr>
<tr>
<td>Biphenyl</td>
<td>2.12E-04</td>
<td>0.005</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>2.67E-04</td>
<td>0.007</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>5.28E-02</td>
<td>1.353</td>
</tr>
<tr>
<td>Methanol</td>
<td>2.50E-03</td>
<td>0.064</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.10E-03</td>
<td>0.028</td>
</tr>
<tr>
<td>Toluene</td>
<td>4.08E-04</td>
<td>0.010</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>2.50E-04</td>
<td>0.006</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.84E-04</td>
<td>0.005</td>
</tr>
</tbody>
</table>

| Total              | 1.84                        |

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology
Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2
Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]
Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]
### Appendix A: Emission Calculations

**Reciprocating Internal Combustion Engines - Natural Gas**

**4-Stroke Lean-Burn (4SLB) Engines**

**Generator NGG2**

<table>
<thead>
<tr>
<th><strong>Company Name:</strong></th>
<th>Four Woods Laminating, Inc. – Plant 1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source Address:</strong></td>
<td>7550 W. 500 South, Topeka, IN 46571</td>
</tr>
<tr>
<td><strong>Operating Permit Number:</strong></td>
<td>T087-41516-00036</td>
</tr>
<tr>
<td><strong>SPM Number:</strong></td>
<td>087-43236-00036</td>
</tr>
<tr>
<td><strong>Reviewer:</strong></td>
<td>William Altman</td>
</tr>
</tbody>
</table>

| Maximum Output Horsepower Rating (hp) | 780 |
| **Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr)** | 7500 |
| **Maximum Hours Operated per Year (hr/yr)** | 8760 |
| **Potential Fuel Usage (MMBtu/yr)** | 51246 |
| **High Heat Value (MMBtu/MMscf)** | 1020 |
| **Potential Fuel Usage (MMcf/yr)** | 50.24 |

<table>
<thead>
<tr>
<th><strong>Pollutant</strong></th>
<th><strong>PM</strong></th>
<th><strong>PM10</strong></th>
<th><strong>PM2.5</strong></th>
<th><strong>SO2</strong></th>
<th><strong>NOx</strong></th>
<th><strong>VOC</strong></th>
<th><strong>CO</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMBtu)</td>
<td>7.71E-05</td>
<td>9.99E-03</td>
<td>9.99E-03</td>
<td>5.88E-04</td>
<td>4.08</td>
<td>1.18E-01</td>
<td>3.17E-01</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr)</td>
<td>0.0020</td>
<td>0.26</td>
<td>0.26</td>
<td>0.015</td>
<td>104.54</td>
<td>3.02</td>
<td>8.12</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

#### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th><strong>Pollutant</strong></th>
<th><strong>Emission Factor (lb/MMBtu)</strong></th>
<th><strong>Potential Emissions (tons/yr)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>8.36E-03</td>
<td>0.214</td>
</tr>
<tr>
<td>Acrolein</td>
<td>5.14E-03</td>
<td>0.132</td>
</tr>
<tr>
<td>Benzene</td>
<td>4.40E-04</td>
<td>0.011</td>
</tr>
<tr>
<td>Biphenyl</td>
<td>2.12E-04</td>
<td>0.005</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>2.67E-04</td>
<td>0.007</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>5.28E-02</td>
<td>1.363</td>
</tr>
<tr>
<td>Methanol</td>
<td>2.50E-03</td>
<td>0.064</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.10E-03</td>
<td>0.028</td>
</tr>
<tr>
<td>Toluene</td>
<td>4.08E-04</td>
<td>0.010</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>2.50E-04</td>
<td>0.006</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.84E-04</td>
<td>0.005</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>1.84</strong></td>
</tr>
</tbody>
</table>

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

**Methodology**

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Fuel Usage (MMBtu/yr) = \[
\text{Maximum Output Horsepower Rating (hp)} \times \text{Brake Specific Fuel Consumption (Btu/hp-hr)} \times \text{Maximum Hours Operated per Year (hr/yr)} / \text{1000000 Btu/MMBtu} \]

Potential Emissions (tons/yr) = \[
\text{Potential Fuel Usage (MMBtu/yr)} \times \text{Emission Factor (lb/MMBtu)} / \text{2000 lb/ton} \]
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

**MM BTU/HR <100**

**Company Name:** Four Woods Laminating, Inc. – Plant 1  
**Source Address:** 7550 W. 500 South, Topeka, IN 46571  
**Operating Permit Number:** T087-41516-00036  
**SPM Number:** 087-43236-00036  
**Reviewer:** William Altman

### Emission Calculations

#### Unit ID  
<table>
<thead>
<tr>
<th>Unit ID</th>
<th>MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMU1</td>
<td>2.33</td>
</tr>
<tr>
<td>AMU2 and AMU3</td>
<td>5.832</td>
</tr>
<tr>
<td>AMU4</td>
<td>1.5</td>
</tr>
<tr>
<td>Boiler 3 and 4</td>
<td>0.8</td>
</tr>
<tr>
<td>Boiler 5</td>
<td>0.266</td>
</tr>
<tr>
<td>Boiler 6</td>
<td>0.154</td>
</tr>
<tr>
<td>Boiler 7</td>
<td>0.4</td>
</tr>
<tr>
<td>Furnace 1</td>
<td>0.055</td>
</tr>
<tr>
<td>Ovens 1 - 5</td>
<td>0.8</td>
</tr>
<tr>
<td><strong>Sum:</strong></td>
<td>12.147</td>
</tr>
</tbody>
</table>

### Heat Input Capacity

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>HHV MMBtu/hr</th>
<th>Potential Throughput MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>mmscf</td>
<td>MMCF/yr</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>12.15</td>
<td>1020</td>
</tr>
<tr>
<td></td>
<td></td>
<td>104.3</td>
</tr>
</tbody>
</table>

### Emission Factor in lb/MMCF

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>0.6</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.</th>
<th>NOx</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>see below</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>1.1E-04</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>6.3E-05</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>3.9E-03</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>9.0E-05</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>1.6E-04</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
<td>2.6E-05</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>5.7E-05</td>
</tr>
<tr>
<td>Chromium</td>
<td>3.9E-03</td>
<td>7.3E-05</td>
</tr>
<tr>
<td>Manganese</td>
<td>2.1E-03</td>
<td>2.0E-05</td>
</tr>
</tbody>
</table>

### Methodology

All emission factors are based on normal firing.  

- MMBtu = 1,000,000 Btu  
- MMCF = 1,000,000 Cubic Feet of Gas  

Emission Factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

The five highest organic and metal HAPs emission factors are provided above.

- Total HAPs: 0.10  
- Worst HAP: 0.09
## Appendix A: Emission Calculations
### Fugitive Dust Emissions - Unpaved Roads

**Company Name:** Four Woods Laminating, Inc. – Plant 1  
**Source Address:** 7550 W. 500 South, Topeka, IN 46571  
**Operating Permit Number:** T087-41516-00036  
**SPM Number:** 087-43236-00036  
**Reviewer:** William Altman

### Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

#### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>70</td>
<td>0.013</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>70</td>
<td>0.013</td>
</tr>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>3.0</td>
<td>1.0</td>
<td>3.0</td>
<td>10.0</td>
<td>30.0</td>
<td>70</td>
<td>0.013</td>
<td></td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>3.0</td>
<td>1.0</td>
<td>3.0</td>
<td>10.0</td>
<td>30.0</td>
<td>70</td>
<td>0.013</td>
<td></td>
</tr>
</tbody>
</table>

**Totals**: 16.0  
**Average Vehicle Weight Per Trip** = 4.4 tons/trip  
**Average Miles Per Trip** = 0.01 miles/trip

### Unmitigated Emission Factor, $E_f$

Unmitigated Emission Factor, $E_f = k_s a W^b$  
(Equation 1a from AP-42 13.2.2)

<table>
<thead>
<tr>
<th>Process</th>
<th>$E_f$ (lb/mile)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>2.84E-02</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>2.84E-02</td>
</tr>
<tr>
<td>Vehicle (entering plant)</td>
<td>1.71E-02</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>1.71E-02</td>
</tr>
</tbody>
</table>

**Totals**: 9.10E-02  
**Mitigated PTE of PM (Before Control) (tons/yr)** = Maximum one-way miles (miles/yr) * Mitigated Emission Factor (lb/mile) * (ton/2000 lbs)

### Methodology

<table>
<thead>
<tr>
<th>Equation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>$W$ = 4.4</td>
<td>Average vehicle weight</td>
</tr>
<tr>
<td>$s$ = 6.0</td>
<td>Mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)</td>
</tr>
<tr>
<td>$a$ = 0.7</td>
<td>= constant (AP-42 Table 13.2.2-2 for Industrial Roads)</td>
</tr>
<tr>
<td>$b$ = 0.45</td>
<td>= constant (AP-42 Table 13.2.2-2 for Industrial Roads)</td>
</tr>
<tr>
<td>$E_{ext} = E * (365 - P)/365$</td>
<td>Mitigated Emission Factor, $E_{ext}$ = $E * (365 - P)/365$ (Equation 2 from AP-42 13.2.2)</td>
</tr>
<tr>
<td>$P$ = 125</td>
<td>Days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)</td>
</tr>
</tbody>
</table>

### Mitigated Emission Factors

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>2.84E-02</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>2.84E-02</td>
</tr>
<tr>
<td>Vehicle (entering plant)</td>
<td>1.71E-02</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>1.71E-02</td>
</tr>
</tbody>
</table>

**Totals**: 9.10E-02  
**Mitigated PTE of PM (After Control) (tons/yr)** = (Mitigated PTE (Before Control) (tons/yr)) * (1 - Dust Control Efficiency)  
**Abbreviations**

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>Particulate Matter</td>
</tr>
<tr>
<td>PM10</td>
<td>Particulate Matter (&lt;10 um)</td>
</tr>
<tr>
<td>PM2.5</td>
<td>Particulate Matter (&lt;2.5 um)</td>
</tr>
<tr>
<td>PTE</td>
<td>Potential to Emit</td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations

Fugitive Dust Emissions - Paved Roads

Company Name: Four Woods Laminating, Inc. – Plant 1
Source Address: 7550 W. 500 South, Topeka, IN 46571
Operating Permit Number: T087-41516-00036
SPM Number: 087-43236-00036
Reviewer: William Altman

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>50</td>
<td>0.009</td>
<td>0.0</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>50</td>
<td>0.009</td>
<td>0.0</td>
</tr>
<tr>
<td>Vehicle (entering plant)</td>
<td>3.0</td>
<td>1.0</td>
<td>3.0</td>
<td>10.0</td>
<td>50</td>
<td>0.009</td>
<td>0.0</td>
<td>17.3</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>3.0</td>
<td>1.0</td>
<td>3.0</td>
<td>10.0</td>
<td>50</td>
<td>0.009</td>
<td>0.0</td>
<td>17.3</td>
</tr>
</tbody>
</table>

Totals 16.0

Average Vehicle Weight Per Trip = 4.4 tons/trip
Average Miles Per Trip = 0.01 miles/trip

Unmitigated Emission Factor, $Ef = \[k \times (sL)^{0.91} \times (W)^{1.02}\]$ (Equation 1 from AP-42 13.2.1)

where $k = 0.011 \quad 0.0022 \quad 0.00054 \quad \text{lb/VMT}$ = particle size multiplier (AP-42 Table 13.2.1-1)

$W = 4.4 \quad 4.4 \quad 4.4 \quad \text{tons}$ = average vehicle weight

$sL = 9.7 \quad 9.7 \quad 9.7 \quad \text{g/m}^2$ = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = Ef \times \left[1 - \left(\frac{p}{4N}\right)\right]$ (Equation 2 from AP-42 13.2.1)

where $p = 125 \quad \text{days of rain greater than or equal to 0.01 inches}$ (see Fig. 13.2.1-2)

$N = 365 \quad \text{days per year}$

Unmitigated Emission Factor, $Ef = 0.392 \quad 0.078 \quad 0.0192 \quad \text{lb/mile}$
Mitigated Emission Factor, $E_{ext} = 0.358 \quad 0.072 \quad 0.0176 \quad \text{lb/mile}$

Process Mitigated PTE of PM (Before Control) (tons/yr) Mitigated PTE of PM10 (Before Control) (tons/yr) Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip) 3.10E-03 6.19E-04 1.52E-04
Vehicle (leaving plant) (one-way trip) 3.10E-03 6.19E-04 1.52E-04
Vehicle (entering plant) (one-way trip) 1.86E-03 3.72E-04 9.12E-05
Vehicle (leaving plant) (one-way trip) 1.86E-03 3.72E-04 9.12E-05

Totals 9.91E-03 1.98E-03 4.86E-04

Methodology

<table>
<thead>
<tr>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>* [Maximum trips per day (trip/day)]</th>
<th>PM = Particulate Matter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum one-way distance (miles/trip)</td>
<td>Maximum one-way distance (feet/trip) / 5280 ft/mile</td>
<td>PM10 = Particulate Matter (&lt;10 um)</td>
<td></td>
</tr>
<tr>
<td>Maximum one-wyes (miles/day)</td>
<td>Maximum trips per year (trip/day) * [Maximum one-way distance (miles/trip)]</td>
<td>PM2.5 = Particulate Matter (&gt;2.5 um)</td>
<td></td>
</tr>
<tr>
<td>Average Vehicle Weight Per Trip (ton/trip)</td>
<td>SUM[Total Weight driven per day (ton/day)] / SUM[Maximun trips per year (trip/day)]</td>
<td>PTE = Potential to Emit</td>
<td></td>
</tr>
<tr>
<td>Average Miles Per Trip (miles/trip)</td>
<td>SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unmitigated PTE (tons/yr)</td>
<td>Maximum one-way miles (miles/yr) * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (Before Control) (tons/yr)</td>
<td>Maximum one-way miles (miles/yr) * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (After Control) (tons/yr)</td>
<td>[Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]</td>
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Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (>2.5 um)
PTE = Potential to Emit
January 21, 2021

Maynard Yoder
Four Woods Laminating Inc
7550 W CR 500 S
Topeka IN 46571

Re: Public Notice
Four Woods Laminating
Permit Level: Title V Significant Permit Modification
Permit Number: 087-43236-00036

Dear Maynard Yoder:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM's online searchable database: [http://www.in.gov/apps/idem/caats/](http://www.in.gov/apps/idem/caats/). Choose Search Option by Permit Number, then enter permit 43236

and

IDEM's Virtual File Cabinet (VFC): [http://www.IN.gov/idem](http://www.IN.gov/idem). Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: [https://www.in.gov/idem/5474.htm](https://www.in.gov/idem/5474.htm)

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the LaGrange County Public Library - Topeka Branch, 133 N Main St, PO Box 236, Topeka IN 46571. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to William Altman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-9664 or dial (317) 233-9664.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 21, 2021

To: LaGrange County Public Library - Topeka Branch 133 N Main St, PO Box 236
    Topeka IN 46571

From: Jenny Acker, Branch Chief
      Permits Branch
      Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Four Woods Laminating
Permit Number: 087-43236-00036

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 21, 2021
Four Woods Laminating
087-43236-00036

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

January 21, 2021

A 30-day public comment period has been initiated for:

Permit Number: 087-43236-00036
Applicant Name: Four Woods Laminating
Location: Topeka, LaGrange County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
# Mail Code 61-53

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<th>IDEM Staff</th>
<th>LPOGOST 1/21/2021 Four Woods Laminating Inc 087-43236-00036 draft/</th>
<th>Type of Mail: CERTIFICATE OF MAILING ONLY</th>
<th>AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING</th>
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<td>Name and address of Sender</td>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
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<td>Maynard Yoder Four Woods Laminating Inc 7550 W CR 500 S Topeka IN 46571 (Source CAATS)</td>
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<td>Topeka Town Council P.O. Box 127 Topeka IN 46571 (Local Official)</td>
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<td>Polly Mishler D &amp; B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)</td>
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<td>Dustin &amp; Muranda Hall 401 N Townline Road LaGrange IN 46761 (Affected Party)</td>
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<td>Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)</td>
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |

**FACSIMILIE OF PS Form 3877**