# Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: HNI Corporation – North Campus

Facility Locations: 3000 Hwy 61 North;

2900 Hwy 22;

3000 University Avenue;

**505 Ford Avenue** 

Muscatine, Iowa 52761

Air Quality Operating Permit Number: 03-TV-032R2

Expiration Date: 08/24/2027

Permit Renewal Application Deadline: 02/24/2027

EIQ Number: 92-2535\*

Facility File Number: 70-01-050\*

\*HON Allsteel (70-01-050; 92-2535), HON Geneva Annex (70-01-073; 92-6972), HON Geneva Plant (70-01-051; 92-2534), and HON Tech Center (70-01-078) were consolidated into one source subject to Title V and now use one facility number (70-01-050) and one EIQ number (92-2535).

#### **Responsible Official**

Name: Ryan Donner Title: Vice President

Mailing Address: 600 East 2<sup>nd</sup> Street Suite 100, Muscatine, IA 52761

Phone #: 563-299-7694

**Permit Contact Person for the Facility** 

Name: Scott Anliker

**Title: Corporate Environmental Manager** 

Mailing Address: 600 East 2<sup>nd</sup> Street Suite 100, Muscatine, IA 52761

Phone #: 563-261-6874

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Mainie Stein

08/25/2022

Marnie Stein, Supervisor of Air Operating Permits Section

Date

## **Table of Contents**

I.	Facility Description and Equipment List4
II.	Plant - Wide Conditions
III.	Emission Point Specific Conditions
IV.	General Conditions
	G1. Duty to Comply
	G2. Permit Expiration
	G3. Certification Requirement for Title V Related Documents
	G4. Annual Compliance Certification
	G5. Semi-Annual Monitoring Report
	G6. Annual Fee
	G7. Inspection of Premises, Records, Equipment, Methods and Discharges
	G8. Duty to Provide Information
	G9. General Maintenance and Repair Duties
	G10. Recordkeeping Requirements for Compliance Monitoring
	G11. Evidence used in establishing that a violation has or is occurring.
	G12. Prevention of Accidental Release: Risk Management Plan Notification and
	Compliance Certification
	G13. Hazardous Release
	G14. Excess Emissions and Excess Emissions Reporting Requirements
	G15. Permit Deviation Reporting Requirements
	G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations
	G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification
	G18. Duty to Modify a Title V Permit
	G19. Duty to Obtain Construction Permits
	G20. Asbestos
	G21. Open Burning
	G22. Acid Rain (Title IV) Emissions Allowances
	G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements
	G24. Permit Reopenings
	G25. Permit Shield
	G26. Severability
	G27. Property Rights
	G28. Transferability
	G29. Disclaimer
	G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification
	G31. Prevention of Air Pollution Emergency Episodes
	G32. Contacts List
<b>T</b> 7	Appondiage 156

### **Abbreviations**

	actual cubic feet per minute
CFR	.Code of Federal Regulation
CE	.control equipment
CEM	.continuous emission monitor
°F	.degrees Fahrenheit
	.emissions inventory questionnaire
EP	.emission point
EU	.emission unit
gr/dscf	grains per dry standard cubic foot
IAC	.Iowa Administrative Code
DNR	.Department of Natural Resources
MVAC	.motor vehicle air conditioner
NAICS	.North American Industry Classification System
NSPS	.new source performance standard
ppm <sub>v</sub>	parts per million by volume
lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal units
SCC	.Source Classification Codes
scfm	standard cubic feet per minute
SIC	.Standard Industrial Classification
TPY	.tons per year
	.United States Environmental Protection Agency
Pollutants	
PM	particulate matter
	particulate matter ten microns or less in diameter
	particulate matter 2.5 microns or less in diameter
SO <sub>2</sub>	
NO <sub>x</sub>	
	volatile organic compound
CO	
	hazardous air pollutant
1171	mazaruous an ponutant

## I. Facility Description and Equipment List

Facility Name: HNI Corporation – North Campus

Permit Number: 03-TV-032R2

Facility Description: Wood and Metal Office Furniture Manufacturing (SICs 2521, 2522)

### **Equipment List**

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
107.RICE.1.EP.1	107.107.GEN.1	Backup Generator	99-A-740
200.SUAdh.F	200.200.SUAdh	Misc. Production Adhesives Application - Allsteel	16-A-337
200.SUAero.F	200.200.SUAero	Misc. Production Aerosols - Allsteel	Exempt
200.SUCln.F	200.200.SUCln	Misc. Production Cleaning Solvent Usage - Allsteel	16-A-338
1237.DCW.1.IV.1	200.1237.DCW.1	Woodworking Baghouse	16-A-426
1300.DCW.1.EP.1	200.1300.DCW.1	Woodworking Operations and Scrap Grinder	98-A-677-S3
1300.DCW.2.EP.1	200.1300.DCW.2	Woodworking Operations	98-A-678-S2
2043.Weld.1.IV.1	200.2043.Weld.1	Production Welding – Panel Hung Weld Cell	18-A-231
2043.Weld.2.IV.1	200.2043.Weld.2	Production Welding – Voi 2 Weld Cell	18-A-232
2043.Weld.3.IV.1	200.2043.Weld.3	Production Welding – Helper Weld Cell	18-A-233
2043.Weld.4.IV.1	200.2043.Weld.4	Production Welding – Bookcase Weld Cell	18-A-234
2043.Weld.5.IV.1	200.2043.Weld.5	Production Welding – Voi 1 Weld Cell	18-A-235
2043.Weld.6.IV.1	200.2043.Weld.6	Production Welding – Accessories 1 Weld Cell	18-A-236
2045. Weld. 0.1 V . 1	200.2043.Weld.8	Production Welding – Stretcher Bar Weld Cell	16-A-230
2043.Weld.7.IV.1	200.2043.Weld.7	Production Welding – Accessories 2 Weld Cell	18-A-237
2744. MFPCB.1.IV.1	201.2744.MFPCB.1	Powder Coat Booth - Panel Main (160 lb/hr)	Exempt
3744.MFPCB.1.IV.1	201.3744.MFPCB.1	Powder Coat Booth - Panel Mini (80 lb/hr)	Exempt
1243. MFPCB.1.IV.1	203.1243. MFPCB.1	Powder Coat Booth - Line 4 (160 lb/hr)	Exempt
1245. MFPCB.2A.IV.1	203.1245. MFPCB.2A	Powder Coat Booth - Kickplate A (52.9 lb/hr)	Exempt
1245. MFPCB.2B.IV.1	203.1245. MFPCB.2B	Powder Coat Booth - Kickplate B (52.9 lb/hr)	Exempt
1245. MFPCB.3A.IV.1	203.1245. MFPCB.3A	Powder Coat Booth - Longs A (52 lb/hr)	Exempt
1245. MFPCB.3B.IV.1	203.1245. MFPCB.3B	Powder Coat Booth - Longs B (52 lb/hr)	Exempt
1245. MFPCB.4A.IV.1	203.1245. MFPCB.4A	Powder Coat Booth - Supports 1 - Legs (30 lb/hr)	Exempt
1245. MFPCB.4B.IV.1	203.1245. MFPCB.4B	Powder Coat Booth - Supports 2 - Panels (50 lb/hr)	Exempt
1268. MFPCB.1.IV.1	203.1268. MFPCB.1	Powder Coat Booth - Geneva (80 lb/hr)	Exempt
2744.IPH.1.EP.1	201.2744.IPH.1	Pretreatment - Indirect Heat	Exempt
2744.IPH.2.EP.1	201.2744.IPH.2	Pretreatment - Indirect Heat	Exempt
1243.IPH.1.EP.1	203.1243.IPH.1	Pretreatment - Indirect Heat	Exempt
1268.IPH.1.EP.1	251.1268.IPH.1	Pretreatment - Indirect Heat	Exempt
1244.Weld.1.IV.1	201.1244.Weld.1	Production Welding – Panel Frame Weld Cell 1	18-A-238

ZLP 4 03-TV-032R2, 08/25/22

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
1244.Weld.2.IV.1	201.1244.Weld.2	Production Welding – Panel Frame Weld Cell 2	18-A-239
1244.Weld.3.IV.1	201.1244.Weld.3	Production Welding – Panel Frame Weld Cell 3	18-A-240
1244.Weld.4.IV.1	201.1244.Weld.4	Production Welding – Panel Frame Weld Cell 4	18-A-241
1244.Weld.5.IV.1	201.1244.Weld.5	Production Welding – Panel Frame Weld Cell 5	18-A-242
1244.Weld.6.IV.1	201.1244.Weld.6	Production Welding – Panel Frame Weld Cell 6	18-A-243
1244.Weld.7.IV.1	201.1244.Weld.7	Production Welding – Panel Frame Weld Cell 7	18-A-244
1244.Weld.8.IV.1	201.1244.Weld.8	Production Welding – Panel Frame Weld Cell 8	18-A-287
2744.MFPCO.1.EP.1	201.2744.DPH.1	Oven Heater	00-A-211-S3
2744.MFPCO.1.EP.2	201.2744.MFPCO.1	Cure Oven for Powder Coatings	16-A-255-S2
2744.MFPT.1.EP.1	201 2744 ) (EPF 1		03-A-222-S1
2744.MFPT.1.EP.2	201.2744.MFPT.1	Washer for Surface Coating Line	03-A-223-S1
2744.MFDO.1.EP.1	201.2744.MFDO.1	Washer Dry Off Oven	00-A-212-S1
3744.MFPCO.1.EP.1	201.3744.DPH.1	Oven Heater, Panel Mini	16-A-191-S2
3744.MFPCO.1.EP.2	201.3744.MFPCO.1	Cure Oven for Powder Coatings, Panel Mini	16-A-257-S2
	203.1243.MFPCO.1	Cure Oven for Powder Coatings	
1243.MFPCO.1.EP.1	203.1243.DPH.1	Oven Heater	06-A-1019-S4
1243.MFPT.1.EP.1			03-A-220-S3
1243.MFPT.1.EP.2	203.1243.MFPT.1	Washer for Surface Coating Line	03-A-221-S3
1245.MFPCO.2A.EP.1	203.1245.MFPCO.2A	Cure Oven for Powder Coatings Oven Heater	20-A-269-S2
1245.MFPCO.2B.EP.1	203.1245.MFPCO.2B	Cure Oven for Powder Coatings Oven Heater	20-A-270-S2
1245.MFPCO.3A.EP.1	203.1245.MFPCO.3A	Cure Oven for Powder Coatings Oven Heater	21-A-139-S1
1245.MFPCO.3B.EP.1	203.1245.MFPCO.3B	Cure Oven for Powder Coatings	21-A-140-S1
1245.MFPCO.4A.EP.1 1245.MFPCO.4A.EP.2	203.1245.MFPCO.4A	Oven Heater  Cure Oven for Powder Coatings, direct fired	21-A-366-S1 21-A-367-S1
1245.MFPCO.4B.EP.1 1245.MFPCO.4B.EP.2	203.1245.MFPCO.4B	Cure Oven for Powder Coatings, direct fired	21-A-368-S1 21-A-369-S1
251.RICE.1.EP.1	251.251.RICE.1	Geneva Fire Pump Engine (121 HP)	Exempt
G1222.MFPCO.1.EP.1	251.G1222.MFPCO.1	Cure Oven	
G1222.WIFPCO.1.EP.1	251.G1222.DPH.1	Heater	16-A-192-S1
G1222.MFPT.1.EP.1	251.G1222.MFPT.1	Washer for Surface Coating Line	16-A-429
G1222.MFPT.1.EP.2	231.G1222.MIFF1.1	Washer for Surface Coating Line	16-A-430
1268.MFPT.1.EP.1	251 1260 MEDT 1	Wesher for Symfon Conting Line	16-A-427
1268.MFPT.1.EP.2	251.1268.MFPT.1	Washer for Surface Coating Line	16-A-428
1268.MFPCO.1.EP.1	251.1268.MFPCO.1	Cure Oven for Powder Coatings	16-A-193-S1
1268.MFPCO.1.EP.2	251.1268.DPH.1	Oven Heater	16-A-348-S2
251.SUAdh.F	251.251.SUAdh	Misc. Production Adhesives Application - Geneva	16-A-339
251.SUAero.F	251.251.SUAero	Misc. Production Aerosols - Geneva	Exempt
251.SUCln.F	251.251.SUCln	Misc. Production Cleaning Solvent Usage - Geneva	16-A-340
	252.2640.DCW.1	Dryer #1 and Dryer #2, 7 vacuum ports, 24 transfer points	
2640.DCW.1.EP.1	252.1278.DPH.1	Natural Gas Burner #1	99-A-1044-S5
	252.1262.DPH.2	Natural Gas Burner #2	
1262.IPH.1.EP.1	252.1262.IPH.1	Oil Heater	Exempt

ZLP 5 03-TV-032R2, 08/25/22

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
1278.IPH.1.EP.1	252.1278.IPH.1	Oil Heater	Exempt
1278.PPP.1.EP.1	252.1278.PPP.1	Compression Molding Wood Press #1	99-A-1039-S3
12/6.PPP.1.EP.1	252.1278.PPP.2	Compression Molding Wood Press #2	99-A-1039-33
1279 DDD 2 ED 1	252.1278.PPP.3	Compression Molding Wood Press #3	00 A 1041 S2
1278.PPP.2.EP.1	252.1278.PPP.4	Compression Molding Wood Press #4	99-A-1041-S3
1270 DDD 2 ED 1	252.1278.PPP.5	Compression Molding Wood Press #5	00 4 1042 52
1278.PPP.3.EP.1	252.1278.PPP.6	Compression Molding Wood Press #6	99-A-1043-S3
1262.PPP.2.EP.1	252.1262.PPP.2	Compression Molding Wood Press #7	01-A-244-S3
1262.PPP.4.EP.1	252.1262.PPP.4	Compression Molding Wood Press #8	01-A-246-S3
1262.PPP.3.EP.1	252.1262.PPP.3	Compression Molding Wood Press #9	01-A-247-S3
1262.PPP.1.EP.1	252.1262.PPP.1	Compression Molding Wood Press #10	06-A-242-S2
1278.STH.1.EP.1	252.1278.STH.1	Manual Sanding Table Hood #1	99-A-024-S3
12/8.51H.1.EP.1	252.1278.STH.2	Manual Sanding Table Hood #2	99-A-024-33
1278.STH.2.EP.1	252.1278.STH.3	Manual Sanding Table Hood #3	00 4 1040 52
12/8.51H.2.EP.1	252.1278.STH.4	Manual Sanding Table Hood #4	99-A-1040-S3
1270 CTH 2 ED 1	252.1278.STH.5	Manual Sanding Table Hood #5	00 A 1042 S2
1278.STH.3.EP.1	252.1278.STH.6	Manual Sanding Table Hood #6	99-A-1042-S3
252.SUAero.F	252.252.SUAero	Misc. Production Aerosols – Geneva Annex	Exempt
252.BlowMolder	252.BlowMolder	Blow Molding	Exempt
252.InjectionMolder	252.InjectionMolder	Plastic Injection Molding	Exempt

## **Insignificant Activities Equipment List**

Insignificant Emission Unit Number	Insignificant Emission Unit Description
100.100.CH	Comfort Heat (4 - units, total 5.23 MMBtu/hr)
105.105.CH	Comfort Heat (13 - units, total 1.15 MMBtu/hr)
107.107.CH	Comfort Heat (4 - units, total 1.35 MMBtu/hr)
200.1222.MUA.1	Air Make Up (3.9 MMBtu/hr)
200.1243.MUA.1	Air Make Up (3.9 MMBtu/hr)
200.1244.MUA.1	Air Make Up (5.4 MMBtu/hr)
200.1245.MUA.1	Air Make Up (5.4 MMBtu/hr)
200.200.CH	Comfort Heat (42 units 52.94 MMBtu/hr total)
200.2107.LSR.1	Small Unit - Metal Cutting Laser (12,000 in/hr)
200.2107.LSR.2	Small Unit - Metal Cutting Laser (12,000 in/hr)
200.2107.LSR.3	Small Unit - Metal Cutting Laser (57,000 in/hr)
200.2107.LSR.4	Small Unit - Metal Cutting Laser (57,000 in/hr)
200.2107.LSR.5	Small Unit - Metal Cutting Laser (57,000 in/hr)
200.2107.LSR.6	Small Unit - Metal Cutting Laser (57,000 in/hr)
200.2107.LSR.7	Small Unit - Metal Cutting Laser (72,000 in/hr)
200.2107.LSR.8	Small Unit - Metal Cutting Laser (72,000 in/hr)
203.1243.DPH.1	Metal Finishing - Cure Oven, Direct Heat (3.63 MMBtu/hr)
203.1243.MFDO.1	Metal Finishing - Dry Off Oven, Direct Heat (1.5 MMBtu/hr)
203.1245.IPH.3A	Washer Heater - Kickplate A (0.2 MMBtu/hr)
203.1245.IPH.3B	Washer Heater - Kickplate B (0.2 MMBtu/hr)

ZLP 6 03-TV-032R2, 08/25/22

Insignificant Emission Unit Number	Insignificant Emission Unit Description
203.1245.IPH.4A	Washer Heater - Longs A (1.0 MMBtu/hr)
203.1245.IPH.4B	Washer Heater - Longs B (1.0 MMBtu/hr)
203.1245.IPH.5A	Washer Heater - Supports 1 Legs (0.69 MMBtu/hr)
203.1245.IPH.5B	Washer Heater - Supports 2 Panels (1.1 MMBtu/hr)
203.1245.MFDO.2A	Dry-off Oven - Kickplate A (0.75 MMBtu/hr)
203.1245.MFDO.2B	Dry-off Oven - Kickplate B (0.75 MMBtu/hr)
203.1245.MFDO.3A	Dry-off Oven - Longs A (1.5 MMBtu/hr)
203.1245.MFDO.3B	Dry-off Oven - Longs B (1.5 MMBtu/hr)
203.1245.MFDO.4A	Dry-off Oven - Supports 1 - Legs (0.99 MMBtu/hr)
203.1245.MFDO.4B	Dry-off Oven - Supports 2 - Panels (1.0 MMBtu/hr)
251.1222.DPH.1	Metal Finish, Cure Oven, Direct (1.6 MMBtu/hr)
251.1268.MFDO	Washer Dry Off Oven (2.5 MMBtu/hr)
251.251.CH	Comfort Heat (34 - units 18.64 MMBtu/hr total)
251.251.Weld.F	Welding – Geneva (17.5 lb/hr)
251.G1222.IPH.1	Metal Finish-Pretreatment, Indirect (0.5 MMBtu/hr)
251.MUA.E	Air Make Up (6.05 MMBtu/hr)
251.MUA.W	Air Make Up (6.5 MMBtu/hr)
252.252.CH	Comfort Heat (2 - units 13 MMBtu/hr total)
252.252.PPSO.1	Pellet Bin (400 lbs/hr)
252.MUA.E	Air Make Up (7.0 MMBtu/hr)
252.MUA.W	Air Make Up (7.0 MMBtu/hr)
107.107.Tank.1	Power - Backup Generator Diesel Fuel Tank

#### **Emission Unit Number Guide:**

105 = HNI Technologies (505 Ford Avenue) 107 = HNI Information Technologies (3000 Hwy 61 N)

100, 200, 201, 202, 203 = Allsteel location (3000 Hwy 61 N)

251 = Geneva Plant location (2900 Hwy 22)

252 = Geneva Annex location (3000 University Avenue)

ZLP 7 03-TV-032R2, 08/25/22

#### **II. Plant-Wide Conditions**

Facility Name: HNI Corporation – North Campus

Permit Number: 03-TV-032R2

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

#### **Permit Duration**

The term of this permit is: 5 Years Commencing on: 08/25/2022

Ending on: 08/24/2027

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

#### **Emission Limits**

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

#### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
- 4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
- 6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

<u>Volatile Organic Compounds (VOCs)</u>: The VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions units at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

#### Recordkeeping Requirements for the Facility-wide VOC limit.

- A. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- B. The owner or operator shall maintain records on the identification and the VOC content of

any material used at the facility except for the emission units specifically excluded in Condition A above. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.

- C. By no later than January 1, 2017, the owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

- D. With the exception of the emission units excluded from the facility wide VOC limit, by no later than January 1, 2017, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
  - iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.
  - iv. The amount of VOC emissions from the facility, in tons.
  - v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

- E. With the exception of the emission units excluded from the facility wide VOC limit, if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - i. The amount of VOC emissions from the facility, in tons.
  - ii. The 365-day rolling total of the amount of VOC emissions from the facility, in tons.

Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Condition E of this permit. If the emissions

once again exceed 192.0 tons, daily recordkeeping will be required per Condition E of this permit.

F. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

Authority for Requirement: DNR Construction Permits 16-A-337, 16-A-338, 00-A-211-S3, 16-A-255-S2, 03-A-222-S1, 03-A-223-S1, 16-A-257-S2, 06-A-1019-S4, 03-A-220-S3, 03-A-221-S3, 16-A-192-S1, 16-A-429, 16-A-430, 16-A-427, 16-A-428, 16-A-193-S1, 16-A-348-S2, 16-A-339, 16-A-340, 99-A-1044-S5, 99-A-1039-S3, 99-A-1041-S3, 99-A-1043-S3, 01-A-244-S3, 01-A-246-S3, 01-A-247-S3, 06-A-242-S2, 20-A-269-S2, 20-A-270-S2, 21-A-139-S1, 21-A-140-S1, 21-A-366-S1, 21-A-367-S1, 21-A-368-S1, 21-A-369-S1

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Applicability:

#### **40 CFR 63 Subpart A Requirements**

This facility has units that are subject to 40 CFR 63 Subpart A: General Provisions.

Authority for Requirement: 40 CFR 63 Subpart A

567 IAC 23.1(4)"a"

#### 40 CFR 63 Subpart RRRR Requirements

This facility has units that are subject to 40 CFR 63 Subpart RRRR: National Emission Standard

for Hazardous Air Pollutants: Surface Coating of Metal Furniture

See appendix for the link to complete text of this standard

Authority for Requirement: 40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

#### 40 CFR 63 Subpart JJ Requirements

This facility has units that are subject to 40 CFR 63 Subpart JJ: National Emission Standard for

Hazardous Air Pollutants: Wood Furniture Manufacturing Operations

See appendix for the link to complete text of this standard

Authority for Requirement: 40 CFR 63 Subpart JJ

567 IAC 23.1(4)"aj"

#### **40 CFR 63 Subpart DDDD Requirements**

This facility has units that are subject to 40 CFR 63 Subpart DDDD: National Emission Standard

for Hazardous Air Pollutants: Plywood and Composite Wood Products

See appendix for the link to complete text of this standard Authority for Requirement: 40 CFR 63 Subpart DDDD

567 IAC 23.1(4)"cd"

#### 40 CFR 63 Subpart ZZZZ Requirements

This facility has units that are subject to 40 CFR 63 Subpart ZZZZ: National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

See appendix for the link to complete text of this standard

Authority for Requirement: 40 CFR 63 Subpart ZZZZ

567 IAC 23.1(4)"cz"

#### 40 CFR 63 Subpart DDDDD Requirements

This facility has units that are subject to 40 CFR 63 Subpart DDDDD: National Emission Standard for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers and Process Heaters

See appendix for the link to complete text of this standard Authority for Requirement: 40 CFR 63 Subpart DDDDD

ZLP 12 03-TV-032R2, 08/25/22

#### **III. Emission Point-Specific Conditions**

Facility Name: HNI Corporation – North Campus

Permit Number: 03-TV-032R2

#### **Emission Point ID Number: 107.RICE.1.EP.1**

#### **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 107.107.GEN.1

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 107.107.GEN.1

Emission Unit Description: Backup Generator

Raw Material/Fuel: Diesel Rated Capacity: 4.93 MMBtu/hr

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 99-A-740

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 3.29 lb/hr

Authority for Requirement: DNR Construction Permit 99-A-740

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"

DNR Construction Permit 99-A-740

ZLP 13 03-TV-032R2, 08/25/22

<sup>(1)</sup> An exceedance of the indicator opacity of 20% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Nitrogen Oxide (NO<sub>x</sub>) Emission Limit(s): 3.2 lb/MMBtu

Authority for Requirement: DNR Construction Permit 99-A-740

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. The facility is limited to using diesel oil #2 as the fuel source for the emergency generator.
  - i. Record the amount of fuel oil used on a monthly basis. This may be documented with meter readings or fuel bills.
- B. The facility is limited to having a maximum sulfur content in the fuel oil of 0.5 weight percent or less.
  - i. Maintain records of the amount of sulfur content in the fuel oil.
- C. The generator is limited to operating a maximum of 500 hours per rolling 12-month period.
  - i. Record the number of hours of operation each time the generator is used and provide a rolling 12-month total of hours operated.

## Operation and Maintenance Requirements 40 CFR 63.6602, 63.6625, 63.6640 and Tables 2c and 6 to Subpart ZZZZ

- A. Change oil and filter every 500 hours of operation or annually, whichever comes first. (See 63.6625(i) for the oil analysis option to extend time frame of requirements.)
- B. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary.
- C. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- D. Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- E. Install a non-resettable hour meter if one is not already installed.
- F. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

#### Operating Limits 40 CFR 63.6640(f)

- A. Any operation other than emergency operation, maintenance and testing and operation in non-emergency situations (up to) 50 hours per year is prohibited.
- B. There is no time limit on the use of emergency stationary RICE in emergency situations.

ZLP 14 03-TV-032R2, 08/25/22

- C. You may operate your emergency stationary RICE up to 100 combined hours per calendar year for maintenance checks and readiness testing. See 40 CFR 63.6640(f)(2) for additional information and restrictions.
- D. You may operate your emergency stationary RICE up to 50 hours per calendar year for non-emergency situations, but those 50 hours are counted toward the 100 hours of maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

#### **Compliance Date**

Per 63.6595(a)(1) you must comply with the provisions of Subpart ZZZZ that are applicable by May 3, 2013.

#### Recordkeeping Requirements 40 CFR 63.6655

- A. Keep records of the maintenance conducted on the stationary RICE.
- B. Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. See 40 CFR 63.6655(f) for additional information.

## Notification and Reporting Requirements 40 CFR 63.6645, 63.6650 and Table 2c to Subpart ZZZZ

- A. An initial notification is not required per 40 CFR 63.6645(a)(5).
- B. A report may be required for failure to perform the work practice requirements on the schedule required in Table 2c. (See Footnote 1 of Table 2c for more information.)

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ

567 IAC 23.1(4)"cz"

DNR Construction Permit 99-A-740

#### **NSPS/NESHAP Applicability:**

The emergency engine is subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR 63.6590(a)(1)(ii) this compression ignition emergency engine, located at a major source, is an existing stationary RICE as it was constructed prior to June 12, 2006.

ZLP 15 03-TV-032R2, 08/25/22

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 13

Stack Opening, (inches, dia.): 6 Exhaust Flow Rate (scfm): 1,200 Exhaust Temperature (°F): 1,034

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 99-A-740

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

#### **Emission Point ID Number: 200.SUAdh.F**

#### **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 200.200.SUAdh

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 200.200.SUAdh

Emission Unit Description: Misc. Production Adhesives Application - Allsteel

Raw Material/Fuel: Adhesives Rated Capacity: 185 lb/hr

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (1)

Authority for Requirement: DNR Construction Permit 16-A-337

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-337

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (200.200.SUAdh), the owner or operator shall multiply the VOC content of each adhesive (lbs/gal) used by the amount of each adhesive used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.

ZLP 17 03-TV-032R2, 08/25/22

<sup>&</sup>lt;sup>(1)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(2)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.
- H. The owner or operator shall keep records on the types of adhesives used and shall identify any contact adhesives, as defined in §63.801.
- I. For contact adhesive usage, the owner or operator shall comply with the emission limits from §63.802. There are no limits for other types of adhesives used in wood furniture manufacturing.
- J. If applicable, the owner or operator shall comply with the requirements of §63.803, Work Practice Standards; §63.804, Compliance procedure and monitoring requirements; §63.806, Recordkeeping requirements; and §63.807, Reporting requirements.

Authority for Requirement: DNR Construction Permit 16-A-337

40 CFR 63 Subpart JJ 567 IAC 23.1(4)"aj"

40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

#### **NSPS/NESHAP Applicability:**

This facility manufacturers both wood furniture and metal furniture. In the Wood Furniture Manufacturing NESHAP, (40 CFR Part 63, Subpart JJ), a contact adhesive (as defined in §63.801) is the only type of adhesive that is regulated. In the Metal Furniture NESHAP, (40 CFR Part 63, Subpart RRRR), all types of adhesives are included under the definition of *coating* from §63.4981.

Adhesives applied to the metal components of wood furniture are subject to Subpart JJ in accordance with §63.800(d)(4). Adhesives applied to wood components of metal furniture are subject to Subpart RRR.

Authority for Requirement: DNR Construction Permit 16-A-337

40 CFR 63 Subpart JJ 567 IAC 23.1(4)"aj"

40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring	requirements listed
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

#### **Emission Point ID Number: 200.SUAero.F**

#### **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 200.200.SUAero

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 200.200.SUAero Emission Unit Description: Misc. Production Aerosols – Allsteel

Raw Material/Fuel: Aerosols

Rated Capacity: N/A

#### **Applicable Requirements**

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

X
$\boxtimes$
X

Authority for Requirement: 567 IAC 22.108(3)

#### **Emission Point ID Number: 200.SUCIn.F**

#### **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 200.200.SUCln

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

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Emission Unit vented through this Emission Point: 200.200.SUCln

Emission Unit Description: Misc. Production Cleaning Solvent Usage – Allsteel

Raw Material/Fuel: Cleaning solvents

Rated Capacity: 2 gal/hr

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (1)

Authority for Requirement: DNR Construction Permit 16-A-338

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

**DNR Construction Permit** 

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (200.200.SUCln), the owner or operator shall multiply the VOC content of each cleaning solvent (lbs/gal) used by the amount of each solvent used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.

<sup>&</sup>lt;sup>(1)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(2)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.
- H. The owner or operator shall comply with all applicable work practice requirements from §63.803, *Work practice standards*.
- I. In accordance with §63.803 (e), *Chemical composition of cleaning and washoff solvents*, the owner or operator shall not use cleaning solvents that contain any of the pollutants listed in Table 4 of Subpart JJ in concentrations subject to MSDS reporting as required by OSHA.

Authority for Requirement: DNR Construction Permit 16-A-338

40 CFR 63 Subpart JJ 567 IAC 23.1(4)"aj" 40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

ZLP 22 03-TV-032R2, 08/25/22

#### **NSPS/NESHAP Applicability:**

This facility manufacturers both wood furniture and metal furniture. This unit is for the cleaning solvents that are used on substrates and on equipment associated with the coating operations.

In the Wood Furniture Manufacturing NESHAP, (40 CFR Part 63, Subpart JJ), cleaning operations are defined in §63.801 as "operations in which organic HAP solvent is used to remove coating material or adhesives from equipment used in wood furniture manufacturing operations."

In the Metal Furniture Coating NESHAP, (40 CFR Part 63, Subpart RRRR), organic HAP emissions from cleaning solvents must be included in demonstrating compliance with the organic THAP emission limit of 0.10 kilogram per liter (0.83 lb/gal) of coating solids. The definition of coating operations in §63.4981 is "equipment used to apply cleaning materials to a substrate to prepare it for coating application or to remove dried or wet coating (surface preparation); to apply coating to a substrate (coating application) and to dry or cure the coating after application; and to clean coating operation equipment (equipment cleaning)." The definition of cleaning material in §63.4981 is "a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g. depainting), from a substrate before or after coating application or from equipment associated with a coating operation such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both."

Authority for Requirement: DNR Construction Permit 16-A-338

40 CFR 63 Subpart JJ 567 IAC 23.1(4)"aj"

40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No X
	Yes No X
Facility Maintained Operation & Maintenance Plan Required?	
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🔀
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 23 03-TV-032R2, 08/25/22

#### Emission Point ID Number: 1237.DCW.1.IV.1

#### **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 200.1237.DCW.1

Emissions Control Equipment ID Number: 1237.DCW.1.BGH Emissions Control Equipment Description: Fabric Filter Baghouse

Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 200.1237.DCW.1

Emission Unit Description: Woodworking Operations

Raw Material/Fuel: Wood Rated Capacity: 60,000 scfm

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 16-A-426

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.070 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-426

Pollutant: Particulate Matter  $(PM_{10})$ 

Emission Limit(s): 1.02 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-426

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 1.02 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 16-A-426

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. The fabric filter baghouse (1237.DCW.1.BGH) shall be equipped with high efficiency filter bags. This shall be done in order to meet the emission limits of this permit.
- B. The owner or operator shall develop an operating and maintenance plan for the fabric filter baghouse (1237.DCW.1.BGH), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
- C. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the fabric filter baghouse (1237.DCW.1.BGH).

Authority for Requirement: DNR Construction Permit 16-A-426

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Exhaust Flow Rate (scfm): 60,000 Discharge Style: Vents inside building

Authority for Requirement: DNR Construction Permit 16-A-426

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

<b>Agency Approved Operation &amp; Maintenance Plan Required?</b> (See Appendix B for Plan)	Yes 🛛 No 🗌
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 25 03-TV-032R2, 08/25/22

#### **Emission Point ID Number: 1300.DCW.1.EP.1**

#### **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 200.1300.DCW.1

Emissions Control Equipment ID Number: 1300.DCW.1.BGH Emissions Control Equipment Description: Fabric Filter Baghouse

Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 200.1300.DCW.1 Emission Unit Description: Woodworking Operations and Scrap Grinder

Raw Material/Fuel: Wood

Rated Capacity: 65,000 scfm; 3,500 lb/hrs scrap grinder

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 99-A-677-S3

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.070 lb/hr

Authority for Requirement: DNR Construction Permit 99-A-677-S3

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.2 lb/hr

Authority for Requirement: DNR Construction Permit 99-A-677-S3

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf; 2.2 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 99-A-677-S3

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. The owner or operator shall maintain a record of the completion date of when the high efficiency filter bags were installed on the fabric filter baghouse (1300.DCW.1.BGH).
- B. The owner or operator shall develop an operating and maintenance plan for the fabric filter baghouse (1300.DCW.1.BGH), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
- C. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the fabric filter baghouse (1300.DCW.1.BGH).

Authority for Requirement: DNR Construction Permit 98-A-677-S3

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Exhaust Flow Rate (scfm): 65,000 Discharge Style: Vents inside building

Authority for Requirement: DNR Construction Permit 98-A-677-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? (See Appendix B for Plan)	Yes 🛛 No 🗌
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 27 03-TV-032R2, 08/25/22

#### Emission Point ID Number: 1300.DCW.2.EP.1

#### **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 200.1300.DCW.2

Emissions Control Equipment ID Number: 1300.DCW.2.BGH Emissions Control Equipment Description: Fabric Filter Baghouse

Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 200.1300.DCW.2

Emission Unit Description: Woodworking Operations

Raw Material/Fuel: Wood Rated Capacity: 44,500 scfm

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 98-A-678-S2

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.070 lb/hr

Authority for Requirement: DNR Construction Permit 98-A-678-S2

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.2 lb/hr

Authority for Requirement: DNR Construction Permit 98-A-678-S2

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf; 2.2 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 98-A-678-S2

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. The owner or operator shall maintain a record of the completion date of when the high efficiency filter bags were installed on the fabric filter baghouse (1300.DCW.2.BGH).
- B. The owner or operator shall develop an operating and maintenance plan for the fabric filter baghouse (1300.DCW.2.BGH), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
- C. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the fabric filter baghouse (1300.DCW.2.BGH).

Authority for Requirement: DNR Construction Permit 98-A-678-S2

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Exhaust Flow Rate (scfm): 44,500 Discharge Style: Vents inside building

Authority for Requirement: DNR Construction Permit 98-A-678-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? (See Appendix B for Plan)	Yes 🛛 No 🗌
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 29 03-TV-032R2, 08/25/22

## Emission Point ID Number: See Table: Associated Equipment – 2043 Welding Cells

Table: Associated Equipment - 2043 Welding Cells

EP ID	EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID	Construction Permit
2043.Weld.1.I V.1	200.2043. Weld.1	Production Welding – Panel Hung Weld Cell	2 welders, each rated at 700 inches weld wire per min.	Torit Cartridge Filter (2043.Weld.DCM. 1)	18-A-231
2043.Weld.2.I V.1	200.2043. Weld.2	Production Welding – Voi 2 Weld Cell	2 welders, each rated at 700 inches weld wire per min.	Torit Cartridge Filter (2043.Weld.DCM. 2)	18-A-232
2043.Weld.3.I V.1	200.2043. Weld.3	Production Welding – Helper Weld Cell	1 welder, rated at 700 inches weld wire per min.	SkatBlast Cartridge Filter (2043.Weld.DCM. 3)	18-A-233
2043.Weld.4.I V.1	200.2043. Weld.4	Production Welding – Bookcase Weld Cell	1 welder, rated at 700 inches weld wire per min.	SkatBlast Cartridge Filter (2043.Weld.DCM. 4)	18-A-234
2043.Weld.5.I V.1	200.2043. Weld.5	Production Welding – Voi 1 Weld Cell	1 welder, rated at 700 inches weld wire per min.	SkatBlast Cartridge Filter (2043.Weld.DCM. 5)	18-A-235
200.2043. Weld.6		Production Welding – Accessories 1 Weld Cell	2 welders, each rated at 700 inches weld wire per min.	2 Dry Filters in series (2043.Weld.6.FF. 1, 2043.Weld 6.FF.2)	
2043.Weld.6.I V.1	200.2043. Weld.8	Production Welding – Stretcher Bar Weld Cell	2 welders, each rated at 700 inches weld wire per min.	2 Dry Filters in series (2043.Weld.8.FF. 1, 2043.Weld.8.FF.2	18-A-236
2043.Weld.7.I V.1	200.2043. Weld.7	Production Welding – Accessories 2 Weld Cell	2 welders, each rated at 700 inches weld wire per min.	2 Dry Filters in series (2043.Weld.7.FF. 1, 2043.Weld.7.FF.2	18-A-237

Raw Material/Fuel: Weld Wire

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

EP ID	EU ID	Opacity (1) 567 IAC 23.3(2)"d"	PM <sub>2.5</sub> (lb/hr)	PM <sub>10</sub> (lb/hr)	PM (lb/hr)	PM (gr/dscf) 567 IAC 23.3(2)"a"
2043.Weld.1 .IV.1	200.2043. Weld.1	40%	0.007	0.12	0.12	0.1
2043.Weld.2 .IV.1	200.2043. Weld.2	40%	0.007	0.068	0.068	0.1
2043.Weld.3 .IV.1	200.2043. Weld.3	40%	NA	0.053	0.053	0.1
2043.Weld.4 .IV.1	200.2043. Weld.4	40%	0.004	0.053	0.053	0.1
2043.Weld.5 .IV.1	200.2043. Weld.5	40%	0.004	0.053	0.053	0.1
2043.Weld.6 .IV.1	200.2043. Weld.6 200.2043. Weld.8	40%	0.014	1.28	1.28	0.1
2043.Weld.7 .IV.1	200.2043. Weld.7	40%	0.007	0.43	0.43	0.1

<sup>&</sup>lt;sup>(1)</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment 2043 Welding Cells

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The welders covered by the construction permits shall be MIG (metal inert gas) welders or GMAW (gas metal arc welding) welders. Prior to using any other type of welders in this emissions unit, the owner or operator shall apply to modify the construction permits.
- B. Prior to installing additional welders that will exhaust through these emission points, the owner or operator shall apply to modify this construction permit. This requirement shall not apply to the installation of a welder that replaces an existing welder and that has the

ZLP 31 03-TV-032R2, 08/25/22

same or lower capacity.

- C. The owner or operator shall develop an operating and maintenance plan for the Cartridge Filters, including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
- D. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Cartridge Filters.

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment 2043 Welding Cells

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Discharge Style: Vents inside building

EP ID	EU ID	Exhaust Flowrate (scfm)	Exhaust Temperature	<b>Construction Permit</b>
2043.Weld.1.IV.1	200.2043.Weld.1	1,364	Ambient	18-A-231
2043.Weld.2.IV.1	200.2043.Weld.2	800	Ambient	18-A-232
2043.Weld.3.IV.1	200.2043.Weld.3	625	Ambient	18-A-233
2043.Weld.4.IV.1	200.2043.Weld.4	625	Ambient	18-A-234
2043.Weld.5.IV.1	200.2043.Weld.5	625	Ambient	18-A-235
2042 W-14 C IV 1	200.2043.Weld.6	7,500	Ambient	19 A 226
2043.Weld.6.IV.1	200.2043.Weld.8	7,500	Ambient	- 18-A-236

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring	requirements listed below
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 33 03-TV-032R2, 08/25/22

#### **Emission Point ID Numbers: See Associated Equipment Table**

#### **Associated Equipment**

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
2744.	201.2744.	Powder Coat Booth - Panel	Powder	160 lb/hr	Evament
MFPCB.1.IV.1	MFPCB.1	Main	Coating	100 10/11	Exempt
3744.MFPCB.1.I	201.3744.	Powder Coat Booth - Panel	Powder	80 lb/hr	Evament
V.1	MFPCB.1	Mini	Coating	80 lb/mr	Exempt
1243.	203.1243.	Powder Coat Booth - Line	Powder	160 lb/hr	Evennt
MFPCB.1.IV.1	MFPCB.1	4	Coating	100 10/111	Exempt
1245.	203.1245.	Powder Coat Booth -	Powder	52.9 lb/hr	Exempt
MFPCB.2A.IV.1	MFPCB.2A	Kickplate A	Coating	32.9 ID/III	
1245.	203.1245.	Powder Coat Booth -	Powder	52.9 lb/hr	Exampt
MFPCB.2B.IV.1	MFPCB.2B	Kickplate B	Coating	32.9 ID/III	Exempt
1245.	203.1245.	Powder Coat Booth -	Powder	52 lb/hr	Exampt
MFPCB.3A.IV.1	MFPCB.3A	Longs A	Coating	32 IU/III	Exempt
1245.	203.1245.	Powder Coat Booth -	Powder	52 lb/hr	Exampt
MFPCB.3B.IV.1	MFPCB.3B	Longs B	Coating	32 ID/III	Exempt
1245.	203.1245.	Powder Coat Booth -	Powder	80 lb/hr	Evennt
MFPCB.4A.IV.1	MFPCB.4A	Supports 1 - Legs	Coating	80 ID/III	Exempt
1245.	203.1245.	Powder Coat Booth -	Powder	80 lb/hr	Evennt
MFPCO.4B.IV.1	MFPCB.4B	Supports 2 - Panels	Coating	80 ID/III	Exempt
1268.	203.1268.	Powder Coat Booth -	Powder	80 lb/hr	Exampt
MFPCB.1.IV.1	MFPCB.1	Geneva	Coating	60 ID/III	Exempt

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

#### **NSPS/NESHAP Applicability:**

These units are subject to 40 CFR 63 Subpart RRRR: *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Furniture*. See appendix for the link to complete text of this standard

Authority for Requirement: 40 CFR 63 Subpart RRRR

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes □ No ☑

Facility Maintained Operation & Maintenance Plan Required? Yes □ No ☑

Yes No No

Authority for Requirement: 567 IAC 22.108(3)

**Compliance Assurance Monitoring (CAM) Plan Required?** 

#### **Emission Point ID Numbers: See Associated Equipment Table**

#### **Associated Equipment**

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
2744.IPH.1.EP.1	201.2744.IPH.1	Pretreatment - Indirect Heat	-	Natural Gas	3.0 MMBtu/hr	Exempt
2744.IPH.2.EP.1	201.2744.IPH.2	Pretreatment - Indirect Heat	-	Natural Gas	3.0 MMBtu/hr	Exempt
1243.IPH.1.EP.1	203.1243.IPH.1	Pretreatment - Indirect Heat	-	Natural Gas	3.2 MMBtu/hr	Exempt
1268.IPH.1.EP.1	251.1268.IPH.1	Pretreatment - Indirect Heat	-	Natural Gas	1.7 MMBtu/hr	Exempt

#### **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

#### **NSPS/NESHAP Applicability:**

These units are subject to 40 CFR 63 Subpart DDDDD: National Emission Standard for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers and Process Heaters. See appendix for the link to complete text of this standard

Authority for Requirement: 40 CFR 63 Subpart DDDDD

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<b>Monitoring Requirements</b>	
The owner/operator of this equipment shall comply with the monitoring rebelow.	equirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 37 03-TV-032R2, 08/25/22

# Emission Point ID Number: See Table: Associated Equipment – 2044 Welding Cells

<u>Table: Associated Equipment - 2044 Welding Cells</u>

EP ID	EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID	Construction Permit
1244.Weld.1.I V.1	201.1244. Weld.1	Production Welding  – Panel Frame Weld  Cell 1	2 welders, each rated at 700 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.1.FF.1)  Dry Filter (main filter) (1244.Weld.1.FF.2)  Dry Filter (secondary filter) (1244.Weld.1.FF.3)	18-A-238
1244.Weld.2.I V.1	201.1244. Weld.2	Production Welding  – Panel Frame Weld  Cell 2	2 welders, each rated at 700 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.2.FF.1)  Dry Filter (main filter) (1244.Weld.2.FF.2)  Dry Filter (secondary filter) (1244.Weld.2.FF.3)	18-A-239
1244.Weld.3.I V.1	201.1244. Weld.3	Production Welding  – Panel Frame Weld  Cell 3	2 welders, each rated at 700 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.3.FF.1)  Dry Filter (main filter) (1244.Weld.3.FF.2)  Dry Filter (secondary filter) (1244.Weld.3.FF.3)	18-A-240
1244.Weld.4.I V.1	201.1244. Weld.4	Production Welding  – Panel Frame Weld  Cell 4	2 welders, each rated at 700 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.4.FF.1)  Dry Filter (main filter) (1244.Weld.4.FF.2)  Dry Filter (secondary filter) (1244.Weld.4.FF.3)	18-A-241
1244.Weld.5.I V.1	201.1244. Weld.5	Production Welding  – Panel Frame Weld  Cell 5	2 welders, each rated at 700 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.5.FF.1) Dry Filter (main filter) (1244.Weld.5.FF.2) Dry Filter (secondary filter) (1244.Weld.5.FF.3)	18-A-242

ZLP 38 03-TV-032R2, 08/25/22

1244.Weld.6.I V.1	201.1244. Weld.6	Production Welding  – Panel Frame Weld  Cell 6	2 welders, each rated at 700 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.6.FF.1)  Dry Filter (main filter) (1244.Weld.6.FF.2)  Dry Filter (secondary filter) (1244.Weld.6.FF.3)	18-A-243
1244.Weld.7.I V.1	201.1244. Weld.7	Production Welding  – Panel Frame Weld  Cell 7	2 welders: one rated at 700 inches weld wire per min; one rated at 1400 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.7.FF.1)  Dry Filter (main filter) (1244.Weld.7.FF.2)  Dry Filter (secondary filter) (1244.Weld.7.FF.3)	18-A-244
1244.Weld.8.I V.1	201.1244. Weld.8	Production Welding  – Panel Frame Weld  Cell 8	2 welders: one rated at 700 inches weld wire per min.	Dry Filter (pre-filter) (1244.Weld.8.FF.1) Dry Filter (main filter) (1244.Weld.8.FF.2) Dry Filter (secondary filter) (1244.Weld.8.FF.3)	18-A-287

Raw Material/Fuel: Weld Wire

# **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

EP ID	EU ID	Opacity (1) 567 IAC 23.3(2)"d"	PM <sub>2.5</sub> (lb/hr)	PM <sub>10</sub> (lb/hr)	PM (lb/hr)	PM (gr/dscf) 567 IAC 23.3(2)"a"
1244.Weld.1 .IV.1	201.1244. Weld.1	40%	0.007	0.39	0.39	0.1
1244.Weld.2 .IV.1	201.1244. Weld.2	40%	0.007	0.39	0.39	0.1
1244.Weld.3 .IV.1	201.1244. Weld.3	40%	0.007	0.39	0.39	0.1
1244.Weld.4 .IV.1	201.1244. Weld.4	40%	0.007	0.39	0.39	0.1
1244.Weld.5 .IV.1	201.1244. Weld.5	40%	0.007	0.39	0.39	0.1
1244.Weld.6 .IV.1	201.1244. Weld.6	40%	0.007	0.39	0.39	0.1
1244.Weld.7 .IV.1	201.1244. Weld.7	40%	0.01	0.39	0.39	0.1
1244.Weld.8 .IV.1	201.1244. Weld.8	40%	0.007	0.39	0.39	0.1

<sup>&</sup>lt;sup>(1)</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment 2044 Welding Cells

### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The welders covered by the construction permits shall be MIG (metal inert gas) welders or GMAW (gas metal arc welding) welders. Prior to using any other type of welders in this emissions unit, the owner or operator shall apply to modify the construction permits.
- B. Prior to installing additional welders that will exhaust through these emission points, the owner or operator shall apply to modify this construction permit. This requirement shall not apply to the installation of a welder that replaces an existing welder and that has the

ZLP 40 03-TV-032R2, 08/25/22

same or lower capacity.

- C. Particulate matter emissions are controlled by three sets of dry filters in series. The owner or operator shall develop an operating and maintenance plan for the Dry Filter (pre-filter) (1244.Weld.1.FF.1), the Dry Filter (main filter) (1244.Weld.1.FF.2), and the Dry Filter (secondary filter) (1244.Weld.1.FF.3) including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
- D. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Dry Filters.
- E. The pressure drop across the dry filters shall be monitored continuously. Filters shall be replaced as required by the electronic monitoring system.

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment 2044 Welding Cells

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Discharge Style: Vents inside building

EP ID	EU ID	Exhaust Flowrate (scfm)	Exhaust Temperature	<b>Construction Permit</b>
1244.Weld.1.IV.1	201.1244.Weld.1	4,500	Ambient	18-A-238
1244.Weld.2.IV.1	201.1244.Weld.2	4,500	Ambient	18-A-239
1244.Weld.3.IV.1	201.1244.Weld.3	4,500	Ambient	18-A-240
1244.Weld.4.IV.1	201.1244.Weld.4	4,500	Ambient	18-A-241
1244.Weld.5.IV.1	201.1244.Weld.5	4,500	Ambient	18-A-242
1244.Weld.6.IV.1	201.1244.Weld.6	4,500	Ambient	18-A-243
1244.Weld.7.IV.1	201.1244.Weld.7	4,500	Ambient	18-A-244
1244.Weld.8.IV.1	201.1244.Weld.8	4,500	Ambient	18-A-287

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring i	requirements listed below
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 42 03-TV-032R2, 08/25/22

## **Emission Point ID Number: 2744.MFPCO.1.EP.1**

# **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
201.2744.MFPCO.1 <sup>(1)</sup>	Cure Oven	-	Powder Coat	160 lbs/hr	00 4 211 52
201.2744.DPH.1 <sup>(1)</sup>	Heater	-	Natural Gas	3.6 MMBtu/hr	00-A-211-S3

<sup>(1)</sup> These emission units are also associated with emission point 2744.MFPCO.1.EP.2

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 00-A-211-S3

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.163 lb/hr

Authority for Requirement: DNR Construction Permit 00-A-211-S3

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.34 lb/hr

Authority for Requirement: DNR Construction Permit 00-A-211-S3

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.34 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 00-A-211-S3

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 00-A-211-S3

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permit 00-A-211-S3

ZLP 43 03-TV-032R2, 08/25/22

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 00-A-211-S3

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. This oven (201.2744.MFPCO.1) is used to cure coatings that are applied in a powder coating line. To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in this oven (201.2744.MFPCO.1) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on this line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

$$E = (Pp - Pw) \times 0.01$$

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

Authority for Requirement: DNR Construction Permit 00-A-211-S3

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

#### NSPS/NESHAP Applicability:

These emission units are subject to 40 CFR 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and all manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

Emission unit 201.2744.MFPCO.1 is a cure oven for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permit 00-A-211-S3

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

ZLP 45 03-TV-032R2, 08/25/22

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 36.06

Stack Opening, (inches, dia.): 12 Exhaust Flow Rate (scfm): 4,080 Exhaust Temperature (°F): 400

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 00-A-211-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 46 03-TV-032R2. 08/25/22

## **Emission Point ID Number: 2744.MFPCO.1.EP.2**

# **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
201.2744.MFPCO.1 <sup>(1)</sup>	Cure Oven	-	Powder Coat	160 lbs/hr	16-A-255-S2
201.2744.DPH.1 <sup>(1)</sup>	Heater	-	Natural Gas	3.6 MMBtu/hr	10-A-255- <b>5</b> 2

<sup>(1)</sup> These emission units are also associated with emission point 2744.MFPCO.1.EP.1

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 16-A-255-S2

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.163 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-255-S2

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.313 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-255-S2

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.313 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 16-A-255-S2

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 16-A-255-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permit 16-A-255-S2

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-255-S2

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. This oven (201.2744.MFPCO.1) is used to cure coatings that are applied in a powder coating line. To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in this oven (201.2744.MFPCO.1) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on this line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

$$E = (Pp - Pw) \times 0.01$$

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart

ZLP 48 03-TV-032R2, 08/25/22

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

RRRR per the definition in §63.4981.

- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

Authority for Requirement: DNR Construction Permit 16-A-255-S2

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

### **NSPS/NESHAP Applicability:**

These emission units are subject to 40 CFR 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and all manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

Emission unit 201.2744.MFPCO.1 is a cure oven for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permit 16-A-255-S2

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

ZLP 49 03-TV-032R2, 08/25/22

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 39.24

Stack Opening, (inches, dia.): 36 Exhaust Flow Rate (scfm): 5,218 Exhaust Temperature (°F): 200

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 16-A-255-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

# Emission Point ID Numbers: 2744.MFPT.1.EP.1, 2744.MFPT.1.EP.2

# **Associated Equipment**

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
2744.MFPT.1.EP.1	201 2744 MEDT 1	Washer for Surface		Pretreatment	1,078	03-A-222-S1
2744.MFPT.1.EP.2	201.2744.MFPT.1	Coating Line	-	Products	gal/min	03-A-223-S1

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

567 IAC 23.3(2)"d"

Authority for Requirement:

DNR Construction Permits 03-A-222-S1 & 03-A-223-S1

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.078 lb/hr

Authority for Requirement: DNR Construction Permits 03-A-222-S1 & 03-A-223-S1

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 1.5 lb/hr

Authority for Requirement: DNR Construction Permits 03-A-222-S1 & 03-A-223-S1

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf, 1.5 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits 03-A-222-S1 & 03-A-223-S1

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permit 03-A-222-S1 & 03-A-223-S1

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 03-A-222-S1 & 03-A-223-S1

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (201.2744.MFPT.1), the owner or operator shall multiply the VOC content of each cleaning chemical (lbs/gal) used by the amount of each cleaning chemical used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.
- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

Authority for Requirement: DNR Construction Permits 03-A-222-S1, 03-A-223-S1

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

### **NSPS/NESHAP Applicability:**

These emission units are subject to 40 CFR 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or

ZLP 52 03-TV-032R2, 08/25/22

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and all manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

EU 201.2744.MFPT.1 is a washer on a surface coating line for metal furniture. Equipment used to clean a substrate to prepare it for coating application is included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permits 03-A-222-S1, 03-A-223-S1

40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

#### **Emission Point Characteristics**

The emission points shall conform to the specifications listed below.

Characteristics	2744.MFPT.1.EP.1	2744.MFPT.1.EP.2
Stack Height, (ft, from the ground)	39.0	38.3
Exhaust Flow Rate (scfm)	8,700	8,700
Stack Opening, (inches, dia.)	24	24
Exhaust Temperature (°F)	140	70
Discharge Style	Vertical Unobstructed	Vertical Unobstructed
Authority for Requirement (DNR Construction Permit)	03-A-222-S1	03-A-223-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🗵
Authority for Requirement: 567 IAC 22.108(3)	

## **Emission Point ID Number: 2744.MFDO.1.EP.1**

## **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 201.2744.MFDO.1

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 201.2744.MFDO.1

Emission Unit Description: Washer Dry Off Oven

Raw Material/Fuel: Natural Gas Rated Capacity: 1.6 MMBtu/hr

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 00-A-212-S1

(1) An exceedance of the indicator opacity of no visible emissions (NVE) will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.0118 lb/hr

Authority for Requirement: DNR Construction Permit 00-A-212-S1

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.018 lb/hr

Authority for Requirement: DNR Construction Permit 00-A-212-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.018 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 00-A-212-S1

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 00-A-212-S1

ZLP 54 03-TV-032R2, 08/25/22

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

A. This emission unit (201.2744.MFDO.1) is part of a surface coating line. Except for in the products of combustion, there are no VOC emissions from this emission point (2744.MFDO.1.EP.1). This permit does not establish any additional operating limits or recordkeeping requirements.

Authority for Requirement: DNR Construction Permit 00-A-212-S1

## **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 36.37

Stack Opening, (inches, dia.): 12 Exhaust Flow Rate (scfm): 3,500 Exhaust Temperature (°F): 130 Discharge Style: Vertical Obstructed

Authority for Requirement: DNR Construction Permit 00-A-212-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# Emission Point ID Number: 3744.MFPCO.1.EP.1 & 3744.MFPCO.1.EP.2

## **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
Omt	Cure Oven for	Equipment	Matchai	Сараспу	TCIMIC
201.3744.MFPCO.1	Powder Coatings, Panel	-	Powder Coating	80 lbs/hr	16-A-257-S2
	Mini				
201.3744.DPH.1	Oven Heater, Panel Mini	-	Natural Gas	2.4 MMBtu/hr	16-A-191-S2

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

(1) An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.074 lb/hr

Authority for Requirement: DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.15 lb/hr

Authority for Requirement: DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf; 0.15 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

ZLP 56 03-TV-032R2, 08/25/22

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

## **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# I. Recordkeeping Requirements for the Facility-wide VOC limit.

- A. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- B. The owner or operator shall maintain records on the identification and the VOC content of any material used at the facility except for the emission units specifically excluded in Condition.I.A. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.
- C. By no later than January 1, 2017, the owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:
  - iii. The identification of each VOC-containing material used at the facility.
  - iv. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

D. With the exception of the emission units excluded in Emission Limits section, by no later than January 1, 2017, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:

ZLP 57 03-TV-032R2, 08/25/22

<sup>&</sup>lt;sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- i. The identification of each VOC-containing material used at the facility.
- ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
- iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.
- iv. The amount of VOC emissions from the facility, in tons.
- v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

E. This oven (201.3744.MFPCO.1) is used to cure coatings that are applied in a powder coating line. To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in this oven (201.3744.MFPCO.1) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on this line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

$$E = (Pp - Pw) \times 0.01$$

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

- F. With the exception of the emission units excluded in Condition.I.A, if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - i. The amount of VOC emissions from the facility, in tons.
  - ii. The 365-day rolling total of the amount of VOC emissions from the facility, in tons.

ZLP 58 03-TV-032R2, 08/25/22

- iii. Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Condition.I.F of this permit. If the emissions once again exceed 192.0 tons, daily recordkeeping will be required per Condition.I.F.
- G. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

# II. Requirements for NESHAP Subpart RRRR

- H. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- I. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the *Emission rate without add-on controls option*.
- J. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- K. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- L. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

Authority for Requirement: DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

## **NSPS/NESHAP Applicability:**

These emission units are subject to 40 CFR 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and all manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

Emission unit 201.3744.MFPCO.1 is a cure oven for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 38.77

Stack Opening, (inches, dia.): 12 Exhaust Flow Rate (scfm): 1,125 Exhaust Temperature (°F): 350

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permits 16-A-257-S2 & 16-A-191-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes No No

Authority for Requirement: 567 IAC 22.108(3)

ZLP 60 03-TV-032R2, 08/25/22

# **Emission Point ID Number: 1243.MFPCO.1.EP.1**

# **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
203.1243.MFPCO.1	Cure Oven for Powder Coatings	-	Powder Coating	160 lbs/hr	06-A-1019-S4
203.1243.DPH.1	Oven Heater	-	Natural Gas	3.63 MMBtu/hr	

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 06-A-1019-S4

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.276 lb/hr

Authority for Requirement: DNR Construction Permit 06-A-1019-S4

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.55 lb/hr

Authority for Requirement: DNR Construction Permit 06-A-1019-S4

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.55 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 06-A-1019-S4

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 06-A-1019-S4

Pollutant: Volatile Organic Compounds

Emission Limit(s): 240.0 (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 06-A-1019-S4

<sup>&</sup>lt;sup>1</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 06-A-1019-S4

# Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

## Recordkeeping Requirements for the Facility-wide VOC limit.

- A. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- B. The owner or operator shall maintain records on the identification and the VOC content of any material used at the facility except for the emission units specifically excluded in Condition A above. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.
- C. The owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:
  - v. The identification of each VOC-containing material used at the facility.
  - vi. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

- D. With the exception of the emission units excluded from the facility wide VOC limit, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:
  - i. The identification of each VOC-containing material used at the facility.

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
- iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.
- iv. The amount of VOC emissions from the facility, in tons.
- v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

E. This oven (203.1243.MFPCO.1) is used to cure coatings that are applied in a powder coating line. To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in this oven (203.1243.MFPCO.1) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on this line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

$$E = (Pp - Pw) \times 0.01$$

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

- F. With the exception of the emission units excluded in the Emission Limits section, if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - i. The amount of VOC emissions from the facility, in tons.
  - ii. The 365-day rolling total of the amount of VOC emissions from the facility, in tons.

- If daily usage records are not available for every day of a month, then the entire month's emissions must be included in the 365-day rolling total calculation until that month is outside the 365-day time period. Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Construction Permit Condition.F. If the emissions once again exceed 192.0 tons, daily recordkeeping will be required per Condition.F.
- G. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

# **Requirements for NESHAP Subpart RRRR**

- H. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- I. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the *Emission rate without add-on controls option*.
- J. The owner or operator shall meet all the requirements of \$63.4951, *How do I demonstrate initial compliance with the emission limitations?* and \$63.4952, *How do I demonstrate continuous compliance with the emission limitations?* Each month following the initial compliance period is a compliance period.
- K. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- L. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931. This shall include the identification and the organic HAP content of any coating, thinner or cleaning material used in the surface coating of metal furniture.

Authority for Requirement: DNR Construction Permit 06-A-1019-S4

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

## **NSPS/NESHAP Applicability**

These emission points are subject to 40 CFR 63 Subpart A General Provisions.

These emission points are subject to 40 CFR Part 63 Subpart RRRR *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture*. These emission units are cure ovens for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: 40 CFR Part 63 Subpart A

40 CFR Part 63 Subpart RRRR

DNR Construction Permit 06-A-1019-S4

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 41.79

Stack Opening, (inches): 17 x 17 Exhaust Flow Rate (scfm): 3,225 Exhaust Temperature (°F): 200

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 06-A-1019-S4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# Emission Point ID Numbers: 1243.MFPT.1.EP.1, 1243.MFPT.1.EP.2

<u>Table: Associated Equipment – Washers for Surface Coating Line</u>

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
1243.MFPT.1.EP.1	202 1242 MEDT 1	Washer for Surface - Pretreatment 116 cm	Pretreatment	116 001/00:0	03-A-220-S3	
1243.MFPT.1.EP.2	203.1243.MFPT.1	Coating Line	-	Products	116 gal/min	03-A-221-S3

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

## **Combined Emission Limits:**

Pollutant: Volatile Organic Compounds (VOC) (1)(2)

Emission Limit(s): 240.0 tons/yr

Authority for Requirement: DNR Construction Permits listed in <u>Table: Associated Equipment</u>

Washers for Surface Coating Line

#### **Individual Emission Limits:**

Pollutant: Opacity

Emission Limit(s): 40% (3)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table: Associated Equipment

Washers for Surface Coating Line

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.0084 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Washers for Surface Coating Line

ZLP 66 03-TV-032R2, 08/25/22

<sup>(1)</sup> Emission points 1245.MFPT.1.EP.1 & 1245.MFPT.1.EP.2

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emission units at the North Campus, excluding emissions from fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(3)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.71 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Washers for Surface Coating Line

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.71 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table: Associated Equipment

- Washers for Surface Coating Line

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (4)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits listed in Table: Associated Equipment

- Washers for Surface Coating Line

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### Recordkeeping Requirements for the Facility-wide VOC limit.

- A. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- B. The owner or operator shall maintain records on the identification and the VOC content of any material used at the facility except for the emission units specifically excluded in Condition A above. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.
- C. By no later than January 1, 2017, the owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:
  - i. The identification of each VOC-containing material used at the facility.

<sup>(4)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

ii. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

- D. With the exception of the emission units excluded from the facility wide VOC limit, by no later than January 1, 2017, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
  - iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.
  - iv. The amount of VOC emissions from the facility, in tons.
  - v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

- E. With the exception of the emission units excluded from the facility wide VOC limit, if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - i. The amount of VOC emissions from the facility, in tons.
  - ii. The 365-day rolling total of the amount of VOC emissions from the facility, in tons.

Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Construction Permit Condition E. If the emissions once again exceed 192.0 tons, daily recordkeeping will be required per Construction Permit Condition E.

F. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date

the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

## **Requirements for NESHAP Subpart RRRR**

- A. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- B. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the *Emission rate without add-on controls option*.
- C. The owner or operator shall meet all the requirements of §63.4951, *How do I demonstrate initial compliance with the emission limitations?* and §63.4952, *How do I demonstrate continuous compliance with the emission limitations?* Each month following the initial compliance period is a compliance period.
- D. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- E. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931. This shall include the identification and the organic HAP content of any coating, thinner or cleaning material used in the surface coating of metal furniture.

Authority for Requirement: DNR Construction Permits 03-A-220-S3 & 03-A-221-S3

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

## **NSPS/NESHAP Applicability**

These emission points are subject to 40 CFR 63 Subpart A General Provisions.

These emission points are subject to 40 CFR Part 63 Subpart RRRR *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture*. Equipment used to clean a substrate to prepare it for coating application is included in the definition of coating operation from §63.4981.

Authority for Requirement: 40 CFR Part 63 Subpart A

40 CFR Part 63 Subpart RRRR

DNR Construction Permits 03-A-220-S3 & 03-A-221-S3

#### **Emission Point Characteristics**

The emission points shall conform to the specifications listed below.

Characteristics	1243.MFPT.1.EP.1	1243.MFPT.1.EP.2
Stack Height, (ft, from the ground)	41.39	41.44
Exhaust Flow Rate (scfm)	1,700	1,700
Stack Opening, (inches, dia.)	24	24
Exhaust Temperature (°F)	140	68
Discharge Style	Vertical Unobstructed	Vertical Unobstructed
Authority for Requirement (DNR Construction Permit)	03-A-220-S3	03-A-221-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 70 03-TV-032R2, 08/25/22

# Emission Point ID Number: See Table Associated Equipment – Powder Cure Ovens – Kickplate A & B

<u>Table: Associated Equipment–Powder Cure Ovens – Kickplate A & B</u>

EP#	EU#	Emission Unit Description	Maximum Design Capacity	Control Equipment Description	Permit #
	202 1245 MEDC	Cure Oven for Powder Coatings <sup>1</sup>	52.9 lbs powder/hr <sup>2</sup>		
1245.MFPCO .2A.EP.1 203.1245.MFPC O.2A	Oven Heater	1.0 MMBTU/hr natural gas heat input	None	20-A-269-S2	
		Cure Oven for Powder Coatings <sup>3</sup>	52.9 lbs powder/hr <sup>2</sup>		
1245.MFPCO .2B.EP.1	203.1245.MFPC O.2B	Oven Heater	1.0 MMBTU/hr natural gas heat input	None	20-A-270-S2

<sup>&</sup>lt;sup>1</sup> Oven for Kickplate Line A

Raw Material/Fuel: Powder Coating, Natural Gas

**Applicable Requirements** 

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

## **Combined Emission Limits:**

Pollutant: Volatile Organic Compounds (VOC) (1)(2)

Emission Limit(s): 240.0 tons/yr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

ZLP 71 03-TV-032R2, 08/25/22

<sup>&</sup>lt;sup>2</sup> Maximum capacity of powder coating application in spray booths that are located before the cure ovens.

<sup>&</sup>lt;sup>3</sup> Oven for Kickplate Line B

<sup>(1)</sup> Emission points 1245.MFPCO.2A.EP.1 and 1245.MFPCO.2B.EP.1

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emission units at the North Campus, excluding emissions from fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD. This is an existing facility-wide limit, and the non-excluded VOC emissions from Longs Line A and Longs Line B are covered by it.

#### **Individual Emission Limits:**

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.11 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.29 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.29 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

<sup>(1)</sup> An exceedance of the indicator opacity of 20% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>&</sup>lt;sup>2</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:

#### Recordkeeping Requirements for the Facility-wide VOC limit.

- A. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- B. The owner or operator shall maintain records on the identification and the VOC content of any material used at the facility except for the emission units specifically excluded in ConditionA. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.
- C. The owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

- D. With the exception of the emission units excluded in the Emission Limits Section, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
  - iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.

ZLP 73 03-TV-032R2, 08/25/22

- iv. The amount of VOC emissions from the facility, in tons.
- v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

E. Ovens EU 203.1245.MFCO.2A and EU 203.1245.MFCO.2B are used to cure coatings that are applied in powder coating lines (identified as the Kickplate Line A and the Kickplate Line B). To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in the ovens (203.1245.MFCO.2A, 203.1245.MFCO.2B) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on the line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

$$E = (Pp - Pw) \times 0.01$$

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

- F. With the exception of the emission units excluded in Condition.A, if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - i. The amount of VOC emissions from the facility, in tons.
  - ii. The 365-day rolling total of the amount of VOC emissions from the facility, in tons.

If daily usage records are not available for every day of a month, then the entire month's emissions must be included in the 365-day rolling total calculation until that month is outside the 365-day time period. Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per

74

- Construction Permit Condition.F. If the emissions once again exceed 192.0 tons, daily recordkeeping will be required per Construction Permit Condition.F.
- G. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

# **Requirements for NESHAP Subpart RRRR**

- H. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- I. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the *Emission rate without add-on controls option*.
- J. The owner or operator shall meet all the requirements of §63.4951, *How do I demonstrate initial compliance with the emission limitations?* and §63.4952, *How do I demonstrate continuous compliance with the emission limitations?* Each month following the initial compliance period is a compliance period.
- K. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- L. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931. This shall include the identification and the organic HAP content of any coating, thinner or cleaning material used in the surface coating of metal furniture.

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment Powder Cure Ovens – Kickplate A & B

# **NSPS/NESHAP Applicability**

These emission points are subject to 40 CFR 63 Subpart A General Provisions.

These emission points are subject to 40 CFR 63 Subpart RRRR *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture*. Emission units 203.1245.MFPCO.2A and 203.1245.MFPCO.2B are cure ovens for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: 40 CFR Part 63 Subpart A

40 CFR Part 63 Subpart RRRR

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

EP ID	Stack Height, Feet	Discharge Style	Stack Opening, inches	Stack Temperature, °F	Exhaust Flowrate, SCFM
1245.MFCO.2A.E P.1	35.0 Feet	Vertical, unobstructed	8.0 inches	375°F	348 scfm
1245.MFCO.2B.E P.1	35.0 Feet	Vertical, unobstructed	8.0 inches	375°F	348 scfm

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Kickplate A & B

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator	of this	equipment	shall	comply	with t	he moni	toring	requirements	listed	below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# Emission Point ID Number: See Table Associated Equipment – Powder Cure Ovens – Longs A & B

Table: Associated Equipment–Powder Cure Ovens – Longs A & B

EP#	EU#	Emission Unit Description	Maximum Design Capacity	Control Equipmen t Descriptio n	Permit #
	203.1245.M FPCO.3A	Cure Oven for Powder Coatings <sup>1</sup>	211.7 lbs powder/hr <sup>2</sup>		21-A-139-S1
		Oven Heater	3.0 MMBTU/hr natural gas heat input	None	
	203.1245.M FPCO.3B	Cure Oven for Powder Coatings <sup>3</sup>	211.7 lbs powder/hr <sup>2</sup>		21-A-140-S1
		Oven Heater	3.0 MMBTU/hr natural gas heat input	None	

<sup>&</sup>lt;sup>1</sup> Oven for Longs Line A

Raw Material/Fuel: Powder Coating, Natural Gas

Applicable Requirements

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

#### **Combined Emission Limits:**

Pollutant: Volatile Organic Compounds (VOC) (1)(2)

Emission Limit(s): 240.0 tons/yr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

<sup>&</sup>lt;sup>2</sup> Maximum capacity of powder coating application in spray booths that are located before the cure ovens.

<sup>&</sup>lt;sup>3</sup> Oven for Longs Line B

<sup>(1)</sup> Emission points 1245.MFPCO.3A.EP.1 and 1245.MFPCO.3B.EP.1

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emission units at the North Campus, excluding emissions from fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD. This is an existing facility-wide limit, and the non-excluded VOC emissions from Longs Line A and Longs Line B are covered by it.

#### **Individual Emission Limits:**

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.11 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.19 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.19 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:

#### Operating Limits and Recordkeeping Requirements for Longs Line A and Longs Line B

- A. The amount of powder coating spray applied in the powder coating booth(s) on the Longs Line A shall not exceed 52 pounds per hour. The powder applied in Longs Line A is cured in cure oven EU 203.1245.MFPCO.3A.
  - i. The owner or operator shall maintain a daily record on the average hourly amount of powder coating spray applied in the powder coating booth(s) on the Longs Line A. This shall be done by recording the amount of powder coating spray applied each day and dividing it by the number of hours that the spray booth(s) operated in the day.
- B. The amount of powder coating spray applied in the powder coating booth(s) on the Longs Line B shall not exceed 52 pounds per hour. The powder applied in Longs Line B is cured in cure oven EU 203.1245.MFPCO.3B.
  - i. The owner or operator shall maintain a daily record on the average hourly amount of powder coating spray applied in the powder coating booth(s) on the Longs Line B. This shall be done by recording the amount of powder coating spray applied each day and dividing it by the number of hours that the spray booth(s) operated in the day.

#### Recordkeeping Requirements for the Facility-wide VOC limit

- A. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- B. The owner or operator shall maintain records on the identification and the VOC content of any material used at the facility except for the emission units specifically excluded in Condition A above. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.
- C. By no later than January 1, 2017, the owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:

- vii. The identification of each VOC-containing material used at the facility.
- viii. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

- D. With the exception of the emission units excluded from the facility wide VOC limit, by no later than January 1, 2017, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
  - iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.
  - iv. The amount of VOC emissions from the facility, in tons.
  - v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

E. Ovens EU 203.1245.MFPCO.3A and EU 203.1245.MFPCO.3B are used to cure coatings that are applied in powder coating lines (identified as the Longs Line A and the Longs Line B). To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in the ovens (203.1245.MFPCO.3A, 203.1245.MFPCO.2B) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on the line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

$$E = (Pp - Pw) \times 0.01$$

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01= Fraction of powder emitted as VOC (subject to the adjustment listed above)

- F. With the exception of the emission units excluded from the facility wide VOC limit, if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - a. The amount of VOC emissions from the facility, in tons.
  - b. The 365-day rolling total of the amount of VOC emissions from the facility, in tons.

Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Construction Permit Condition E. If the emissions once again exceed 192.0 tons, daily recordkeeping will be required per Construction Permit Condition E.

G. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

#### **Requirements for NESHAP Subpart RRRR**

- H. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- I. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the *Emission rate without add-on controls option*.
- J. The owner or operator shall meet all the requirements of §63.4951, *How do I demonstrate initial compliance with the emission limitations?* and §63.4952, *How do I demonstrate*

continuous compliance with the emission limitations? Each month following the initial compliance period is a compliance period.

- K. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- L. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931. This shall include the identification and the organic HAP content of any coating, thinner or cleaning material used in the surface coating of metal furniture.

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment Powder Cure Ovens – Longs A & B

# NSPS/NESHAP Applicability

These emission points are subject to 40 CFR 63 Subpart A General Provisions.

These emission points are subject to 40 CFR 63 Subpart RRRR *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture*. Emission units 203.1245.MFPCO.3A and 203.1245.MFPCO.3B are cure ovens for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: 40 CFR Part 63 Subpart A

40 CFR Part 63 Subpart RRRR

DNR Construction Permits listed in Table: Associated Equipment

Powder Cure Ovens – Longs A & B

ZLP 82 03-TV-032R2, 08/25/22

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

EP ID	Stack Height, Feet	Discharge Style	Stack Opening, inches	Stack Temperature, °F	Exhaust Flowrate, SCFM
1245.MFPCO.3A.EP.1	34.75 Feet	Vertical, unobstructed	12.0 inches	375°F	900 scfm
1245.MFPCO.3B.EP.1	34.75 Feet	Vertical, unobstructed	12.0 inches	375°F	900 scfm

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment Powder Cure Ovens – Longs A & B

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: See Table Associated Equipment for Cure Ovens for Powder Coatings, Direct Fired**

Table: Associated Equipment for Cure Ovens for Powder Coatings, Direct Fired

EP#	EU#	Emission Unit Description	Maximum Design Capacity	Control Equipment Description	Permit #
1245.MFPCO. 4A.EP.1		Cure Oven for	80 lbs powder/hr <sup>2</sup>		21-A-366-S1
1245.MFPCO. 4A.EP.2	203.1245.MFPCO.4A	Powder Coatings, direct fired <sup>1</sup>	1.32 MMBTU/hr natural gas heat input	None	21-A-367-S1
1245.MFPCO. 4B.EP.1		Cure Oven for	80 lbs powder/hr <sup>2</sup>		21-A-368-S1
1245.MFPCO. 4B.EP.2	203.1245.MFPCO.4B	Powder Coatings, direct fired <sup>3</sup>	1.42 MMBTU/hr natural gas heat input	None	21-A-369-S1

<sup>&</sup>lt;sup>1</sup> Oven for Supports 1 – Legs Line.

Raw Material/Fuel: Powder Coating, Natural Gas

**Applicable Requirements** 

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

#### **Combined Emission Limits:**

Pollutant: Volatile Organic Compounds (VOC)<sup>(1)(2)</sup>

Emission Limit(s): 240.0 tons/yr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

ZLP 84 03-TV-032R2, 08/25/22

<sup>&</sup>lt;sup>2</sup> Maximum capacity of powder coating application in spray booths that are located before the cure ovens.

<sup>&</sup>lt;sup>3</sup> Oven for Supports 1 – Panels Line.

<sup>(1)</sup> Emission points 1245.MFPCO.4A.EP.1, 1245.MFPCO.4A.EP.2, 1245.MFPCO.4B.EP.1, 1245.MFPCO.4B.EP.2

<sup>&</sup>lt;sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emission units at the North Campus, excluding emissions from fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD. This is an existing facility-wide limit, and the non-excluded VOC emissions from the Supports 1 and Supports 2 Lines are covered by it.

#### Individual Emission Limits for 1245.MFPCO.4A.EP.1 & 1245.MFPCO.4A.EP.2:

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.034 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.034 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.034 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

ZLP 85 03-TV-032R2, 08/25/22

<sup>&</sup>lt;sup>1</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>&</sup>lt;sup>2</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

#### Individual Emission Limits for 1245.MFPCO.4B.EP.1 & 1245.MFPCO.4B.EP.2:

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.054 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.054 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.054 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

ZLP 86 03-TV-032R2, 08/25/22

<sup>&</sup>lt;sup>1</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:

# Operating Limits and Recordkeeping Requirements for Supports 1 Line - Legs and Supports 2 Line - Panels

- A. The amount of powder coating spray applied in the powder coating booth(s) on the Supports 1 Line Legs shall not exceed 30 pounds per hour. The powder applied in Supports 1 Line Legs is cured in cure oven EU 203.1245.MFPCO.4A.
  - i. The owner or operator shall maintain a daily record on the average hourly amount of powder coating spray applied in the powder coating booth(s) on the Supports 1 Line Legs (in pounds). This shall be done by recording the amount in pounds of the powder coating spray applied each day and the number of hours that the powder coating booth(s) operated and by dividing the amount of powder by the number of hours that the spray booth(s) operated in the day.
- B. The amount of powder coating spray applied in the powder coating booth(s) on the Supports 2 Line Panels shall not exceed 50 pounds per hour. The powder applied in Supports 2 Line Panels is cured in cure oven EU 203.1245.MFPCO.4B.
  - i. The owner or operator shall maintain a daily record on the average hourly amount of powder coating spray applied in the powder coating booth(s) on the Supports 2 Line Panels (in pounds). This shall be done by recording the amount in pounds of the powder coating spray applied each day and the number of hours that the powder coating booth(s) operated and by dividing the amount of powder by the number of hours that the spray booth(s) operated in the day.

#### Recordkeeping Requirements for the Facility-wide VOC limit

- C. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- D. The owner or operator shall maintain records on the identification and the VOC content of any material used at the facility except for the emission units specifically excluded in ConditionC. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.

ZLP 87 03-TV-032R2, 08/25/22

- E. The owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:
  - iii. The identification of each VOC-containing material used at the facility.
  - iv. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

- F. With the exception of the emission units excluded in Construction Permit Condition.C, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
  - iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.
  - iv. The amount of VOC emissions from the facility, in tons.
  - v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

G. Ovens EU 203.1245.MFPCO.4A and EU 203.1245.MFPCO.4B are used to cure coatings that are applied in powder coating lines (identified as the Supports 1 - Legs and the Supports 2 - Panels Lines). To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in the ovens (203.1245.MFPCO.4A, 203.1245.MFPCO.4B) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on the line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the

following equation:

 $E = (Pp - Pw) \times 0.01$ 

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01= Fraction of powder emitted as VOC (subject to the adjustment listed above) H. With the exception of the emission units excluded in Condition.C., if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:

- i. The amount of VOC emissions from the facility, in tons.
- ii. The 365-day rolling total of the amount of VOC emissions from the facility, in tons.

If daily usage records are not available for every day of a month, then the entire month's emissions must be included in the 365-day rolling total calculation until that month is outside the 365-day time period. Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Construction Permit Condition.H. If the emissions once again exceed 192.0 tons, daily recordkeeping will be required per Construction Permit Condition.H.

I. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

#### **Requirements for NESHAP Subpart RRRR**

J. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface

coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.

- K. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the *Emission rate without add-on controls option*.
- L. The owner or operator shall meet all the requirements of §63.4951, *How do I demonstrate initial compliance with the emission limitations?* and §63.4952, *How do I demonstrate continuous compliance with the emission limitations?* Each month following the initial compliance period is a compliance period.
- M. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- N. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931. This shall include the identification and the organic HAP content of any coating, thinner or cleaning material used in the surface coating of metal furniture.

Authority for Requirement: 40 CFR Part 63 Subpart A

40 CFR Part 63 Subpart RRRR

DNR Construction Permits listed in Table: Associated Equipment

for Cure Ovens for Powder Coatings, Direct Fired

ZLP 90 03-TV-032R2, 08/25/22

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

EP ID	Stack Height, Feet	Discharge Style	Stack Opening, inches	Stack Temperature, °F	Exhaust Flowrate, SCFM
1245.MFPCO.4A.EP.1	36.0 Feet	Vertical, unobstructed	12.0 inches	375°F	759 scfm
1245.MFPCO.4A.EP.2	36.0 Feet	Vertical, unobstructed	12.0 inches	375°F	949 scfm
1245.MFPCO.4B.EP.1	36.0 Feet	Vertical, unobstructed	12.0 inches	375°F	822 scfm
1245.MFPCO.4B.EP.2	36.0 Feet	Vertical, unobstructed	12.0 inches	375°F	949 scfm

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment for Cure Ovens for Powder Coatings, Direct Fired

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.* 

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: 251.RICE.1.EP.1**

# **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 251.251.RICE.1

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

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Emission Unit vented through this Emission Point: 251.251.RICE.1

Emission Unit Description: Fire Pump Engine

Raw Material/Fuel: Diesel Rated Capacity: 121 HP

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

(1) An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"e"

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **NSPS/NESHAP Applicability:**

The emergency engine is subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR 63.6590(a)(1)(ii) this compression ignition emergency engine, located at a major source, is an existing stationary RICE as it was constructed prior to June 12, 2006.

# **Compliance Date**

Per 63.6595(a)(1) you must comply with the provisions of Subpart ZZZZ that are applicable by May 3, 2013.

# Operation and Maintenance Requirements 40 CFR 63.6602, 63.6625, 63.6640 and Tables 2c and 6 to Subpart ZZZZ

- A. Change oil and filter every 500 hours of operation or annually, whichever comes first. (See 63.6625(i) for the oil analysis option to extend time frame of requirements.)
- B. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary.
- C. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- D. Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- E. Install a non-resettable hour meter if one is not already installed.
- F. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

#### Operating Limits 40 CFR 63.6640(f)

- A. Any operation other than emergency operation, maintenance and testing and operation in non-emergency situations (*up to*) 50 hours per year is prohibited.
- B. There is no time limit on the use of emergency stationary RICE in emergency situations.
- C. You may operate your emergency stationary RICE up to 100 combined hours per calendar year for maintenance checks and readiness testing. See 40 CFR 63.6640(f)(2) for additional information and restrictions.
- D. You may operate your emergency stationary RICE up to 50 hours per calendar year for non-emergency situations, but those 50 hours are counted toward the 100 hours of maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

ZLP 93 03-TV-032R2, 08/25/22

# Recordkeeping Requirements 40 CFR 63.6655

- A. Keep records of the maintenance conducted on the stationary RICE.
- B. Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. See 40 CFR 63.6655(f) for additional information.

# Notification and Reporting Requirements 40 CFR 63.6645, 63.6650 and Table 2c to Subpart ZZZZ

- A. An initial notification is not required per 40 CFR 63.6645(a)(5).
- B. A report may be required for failure to perform the work practice requirements on the schedule required in Table 2c. (See Footnote 1 of Table 2c for more information.)

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ 567 IAC 23.1(4)"cz"

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Yes 🗌 No 🖂
Yes 🗌 No 🖂
Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 94 03-TV-032R2, 08/25/22

#### **Emission Point ID Number: G1222.MFPCO.1.EP.1**

# **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
251.G1222.MFPCO.1	Cure Oven	-	Powder Coating	40 lbs/hr	16-A-192-S1
251.G1222.DPH.1	Heater	-	Natural Gas	1.6 MMBtu/hr	10-A-192-31

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 16-A-192-S1

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.22 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-192-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.22 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 16-A-192-S1

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 16-A-192-S1

Pollutant: Volatile Organic Compounds

Emission Limit(s): 240.0 (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-192-S1

<sup>&</sup>lt;sup>1</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-192-S1

# Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. This oven (251.G1222.MFPCO.1) is used to cure coatings that are applied in a powder coating line. To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in this oven (251.G1222.MFPCO.1) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on this line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

$$E = (Pp - Pw) \times 0.01$$

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

Authority for Requirement: DNR Construction Permit 16-A-192-S1

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

#### **NSPS/NESHAP Applicability:**

These emission points are subject to 40 CFR Part 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and al manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

Emission unit 251.G1222.MFPCO.1 is a cure oven for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permit 16-A-192-S1

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

ZLP 97 03-TV-032R2, 08/25/22

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 33.25

Stack Opening, (inches): 6 x 6 Exhaust Flow Rate (scfm): 1,857 Exhaust Temperature (°F): 120

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 16-A-192-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# Emission Point ID Numbers: G1222.MFPT.1.EP.1, G1222.MFPT.1.EP.2

# **Associated Equipment**

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
G1222.MFPT.1.EP.1	251.G1222.MFPT.1	Washer for Surface	-	Pretreatment Products	3.3 gal/hr	16-A-429
G1222.MFPT.1.EP.2		Coating Line	-			16-A-430

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits 16-A-249 & 16-A-430

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.31 lb/hr

Authority for Requirement: DNR Construction Permits 16-A-249 & 16-A-430

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.31 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits 16-A-249 & 16-A-430

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permits 16-A-249 & 16-A-430

Pollutant: Volatile Organic Compounds

Emission Limit(s): 240.0 (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits 16-A-249 & 16-A-430

<sup>&</sup>lt;sup>1</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits 16-A-249 & 16-A-430

# Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (251.G1222.MFPT.1), the owner or operator shall multiply the VOC content of each cleaning chemical (lbs/gal) used by the amount of each cleaning chemical used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.
- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

# NSPS/NESHAP Applicability:

These emission points are subject to 40 CFR Part 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and all manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

ZLP 100 03-TV-032R2, 08/25/22

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

EU 251.G1222.MFPT.1 is a washer on a surface coating line for metal furniture. Equipment used to clean a substrate to prepare it for coating application is included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permits 16-A-429 & 16-A-430

40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

#### **Emission Point Characteristics**

The emission points shall conform to the specifications listed below.

Characteristics	G1222.MFPT.1.EP.1	G1222.MFPT.1.EP.2	
Stack Height, (ft, from the ground)	24.75	24.42	
Exhaust Flow Rate (scfm)	3,655	3,655	
Stack Opening, (inches, dia.)	18	18	
Exhaust Temperature (°F)	120	120	
Discharge Style	Vertical Unobstructed	Vertical Unobstructed	
Authority for Requirement (DNR Construction Permit)	16-A-429	16-A-430	

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

Authority for Requirement: 567 IAC 22.108(3)

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

ZLP 101 03-TV-032R2, 08/25/22

#### **Emission Point ID Number: 1268.MFPT.1.EP.1**

# **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 251.1268.MFPT.1<sup>(1)</sup>

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 251.1268.MFPT.1<sup>(1)</sup>

Emission Unit Description: Washer for Surface Coating Line

Raw Material/Fuel: Pretreatment Products

Rated Capacity: 3.3 gal/hr

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits 16-A-427

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.34 lb/hr

Authority for Requirement: DNR Construction Permits 16-A-427

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.34 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits 16-A-427

Pollutant: Volatile Organic Compounds

Emission Limit(s): 240.0 (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits 16-A-427

<sup>(1)</sup>This emission unit is also associated with emission point 1268.MFPT.1.EP.2

<sup>&</sup>lt;sup>1</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits 16-A-427

# Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (251.1268.MFPT.1), the owner or operator shall multiply the VOC content of each cleaning chemical (lbs/gal) used by the amount of each cleaning chemical used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.
- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

#### **NSPS/NESHAP Applicability:**

This emission point is subject to 40 CFR Part 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All

ZLP 103 03-TV-032R2, 08/25/22

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

storage containers, all pumps and piping, and al manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

EU 251.1268.MFPT.1 is a washer on a surface coating line for metal furniture. Equipment used to clean a substrate to prepare it for coating application is included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permits 16-A-427

40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 24.42

Stack Opening, (inches, dia.): 18 Exhaust Flow Rate (scfm): 4,000 Exhaust Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 16-A-427

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 104 03-TV-032R2, 08/25/22

# **Emission Point ID Number: 1268.MFPT.1.EP.2**

# **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 251.1268.MFPT.1<sup>(1)</sup>

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 251.1268.MFPT.1<sup>(1)</sup>

Emission Unit Description: Washer for Surface Coating Line

Raw Material/Fuel: Pretreatment Products

Rated Capacity: 3.3 gal/hr

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits 16-A-428

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.31 lb/hr

Authority for Requirement: DNR Construction Permits 16-A-428

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf, 0.31 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits 16-A-428

Pollutant: Volatile Organic Compounds

Emission Limit(s): 240.0 (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits 16-A-428

<sup>(1)</sup>This emission unit is also associated with emission point 1268.MFPT.1.EP.1

<sup>&</sup>lt;sup>1</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits 16-A-428

# Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (251.1268.MFPT.1), the owner or operator shall multiply the VOC content of each cleaning chemical (lbs/gal) used by the amount of each cleaning chemical used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.
- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

#### **NSPS/NESHAP Applicability:**

This emission point is subject to 40 CFR Part 63 Subpart RRRR *National Emission Standards* for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All

ZLP 106 03-TV-032R2, 08/25/22

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

storage containers, all pumps and piping, and al manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

EU 251.1268.MFPT.1 is a washer on a surface coating line for metal furniture. Equipment used to clean a substrate to prepare it for coating application is included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permit 16-A-428

40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 29

Stack Opening, (inches, dia.): 18 Exhaust Flow Rate (scfm): 3,655 Exhaust Temperature (°F): 120

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 16-A-428

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🗵
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 107 03-TV-032R2, 08/25/22

#### **Emission Point ID Number: 1268.MFPCO.1.EP.1**

# **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit	
251.1268.MFPCO.1 <sup>(1)</sup>	Cure Oven	-	Powder Coating	80 lbs/hr	16 A 102 C1	
251.1268.DPH.1 <sup>(1)</sup>	Heater	-	Natural Gas	2.5 MMBtu/hr	16-A-193-S1	

<sup>(1)</sup> These emission units are also associated with emission point 1268.MFPCO.EP.2.

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 16-A-193-S1

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.46 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-193-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.46 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 16-A-193-S1

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 16-A-193-S1

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permit 16-A-193-S1

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-193-S1

ZLP 108 03-TV-032R2, 08/25/22

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. This oven (251.1268.MFPCO.1) is used to cure coatings that are applied in a powder coating line. To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in this oven (251.1268.MFPCO.1) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on this line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

 $E = (Pp - Pw) \times 0.01$ 

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.

<sup>&</sup>lt;sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

Authority for Requirement: DNR Construction Permit 16-A-193-S1

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

#### **NSPS/NESHAP Applicability:**

These emission points are subject to 40 CFR Part 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and al manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

Emission unit 251.1268.MFPCO.1 is a cure oven for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permit 16-A-193-S1

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 20.67

Stack Opening, (inches, dia.): 12 Exhaust Flow Rate (scfm): 1,857 Exhaust Temperature (°F): 120

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 16-A-193-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring	requirements listed
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 111 03-TV-032R2, 08/25/22

#### **Emission Point ID Number: 1268.MFPCO.1.EP.2**

## **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
251.1268.MFPCO.1 <sup>(1)</sup>	Cure Oven	-	Powder Coating	80 lbs/hr	16-A-348-S2
251.1268.DPH.1 <sup>(1)</sup>	Heater	-	Natural Gas	2.55 MMBtu/hr	10-A-346-32

<sup>(1)</sup> These emission units are also associated with emission point 1268.MFPCO.EP.1.

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 16-A-348-S2

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.212 lb/hr

Authority for Requirement: DNR Construction Permit 16-A-348-S2

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.212 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 16-A-348-S2

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 16-A-348-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permit 16-A-348-S2

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-348-S2

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. This oven (251.1268.MFPCO.1) is used to cure coatings that are applied in a powder coating line. To estimate monthly VOC emissions due to the curing of powder, the owner or operator shall multiply the amount of powder cured in this oven (251.1268.MFPCO.1) each month by 0.01 (1% loss). The amount of powder cured in the oven shall be determined by multiplying the amount of powder applied in spray booth(s) on this line by the transfer efficiency of the powder coating applicator(s) (for example, 65% or 0.65). To convert from pounds to tons, divide the pounds of emissions per month by 2000. The 1% loss is based on a total loss factor of 1.5%, where 1% of the powder is considered emitted as VOC and 0.5% of the powder is considered emitted as particulate matter. The owner or operator shall adjust the VOC loss factor in the monthly calculations if the total loss factor is determined to be greater than or less than 1.5%. As an alternative, the owner or operate may determine VOC emissions (pounds) from all the powder coating lines at the facility, by using the following equation:

 $E = (Pp - Pw) \times 0.01$ 

Where:

E = pounds of VOC emissions from all powder coating lines; divide by 2000 to convert to tons

Pp = the amount of powder coatings purchased each month

Pw = the amount of waste powder coating shipped off-site each month

0.01 = Fraction of powder emitted as VOC (subject to the adjustment listed above)

C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol

<sup>&</sup>lt;sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.

Authority for Requirement: DNR Construction Permit 16-A-348-S2

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

#### **NSPS/NESHAP Applicability:**

These emission points are subject to 40 CFR Part 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

The affected source for this subpart is the collection of all equipment used for the surface coating of metal furniture. This includes: 1.) All coating operations as defined in §63.4981; 2.) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; 3.) All manual and automated equipment and containers and all pumps and piping within the affected source used for conveying coatings, thinners, and cleaning materials; and 4.) All storage containers, all pumps and piping, and al manual and automated equipment and containers within the affected source used for conveying waste materials generated by a coating operation.

Emission unit 251.1268.MFPCO.1 is a cure oven for the surface coating of metal furniture. Cure ovens are included in the definition of coating operation from §63.4981.

Authority for Requirement: DNR Construction Permit 16-A-348-S2

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

ZLP 114 03-TV-032R2, 08/25/22

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 21.33

Stack Opening, (inches, dia.): 24

Exhaust Flow Rate (scfm): Non-powered vent

Exhaust Temperature (°F): 120

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 16-A-348-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: 251.SUAdh.F**

## **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 251.251.SUAdh

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

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Emission Unit vented through this Emission Point: 251.251.SUAdh

Emission Unit Description: Misc. Production Adhesives Application - Geneva

Raw Material/Fuel: Adhesives

Rated Capacity: N/A

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (1)

Authority for Requirement: DNR Construction Permit 16-A-339

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-339

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (251.251.SUAdh), the owner or operator shall multiply the VOC content of each adhesive (lbs/gal) used by the amount of each adhesive used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.

ZLP 116 03-TV-032R2, 08/25/22

<sup>(1)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(2)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.
- H. The owner or operator shall keep records on the types of adhesives used and shall identify any contact adhesives, as defined in §63.801.
- I. For contact adhesive usage, the owner or operator shall comply with the emission limits from §63.802. There are no limits for other types of adhesives used in wood furniture manufacturing.
- J. If applicable, the owner or operator shall comply with the requirements of §63.803, Work Practice Standards; §63.804, Compliance procedure and monitoring requirements; §63.806, Recordkeeping requirements; and §63.807, Reporting requirements.

Authority for Requirement: DNR Construction Permit 16-A-339

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

#### **NSPS/NESHAP Applicability:**

This emission point is subject to 40 CFR Part 63 Subpart RRRR *National Emission Standards* for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

This facility manufacturers both wood furniture and metal furniture. In the Wood Furniture Manufacturing NESHAP, (40 CFR Part 63, Subpart JJ), a contact adhesive (as defined in §63.801) is the only type of adhesive that is regulated. In the Metal Furniture NESHAP, (40 CFR Part 63, Subpart RRRR), all types of adhesives are included under the definition of *coating* from §63.4981.

Adhesives applied to the metal components of wood furniture are subject to Subpart JJ in accordance with §63.800(d)(4). Adhesives applied to wood components of metal furniture are subject to Subpart RRRR.

Authority for Requirement: DNR Construction Permit 16-A-339

40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring	requirements listed
below.	•
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 118 03-TV-032R2, 08/25/22

## **Emission Point ID Number: 251.SUAero.F**

## **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 251.251.SUAero

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 251.251.SUAero Emission Unit Description: Misc. Production Aerosols - Geneva

Raw Material/Fuel: Aerosols

Rated Capacity: N/A

## **Applicable Requirements**

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

#### **Emission Point ID Number: 251.SUCln.F**

## **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 251.251.SUCln

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 251.251.SUCln

Emission Unit Description: Misc. Production Cleaning Solvent Usage - Geneva

Raw Material/Fuel: Cleaning Solvents

Rated Capacity: N/A

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (1)

Authority for Requirement: DNR Construction Permit 16-A-340

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (2)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permit 16-A-340

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. To estimate monthly VOC emissions from this emission unit (251.251.SUCln.F), the owner or operator shall multiply the VOC content of each cleaning solvent (lbs/gal) used by the amount of each solvent used each month (gallons), and then sum the total. To convert from pounds to tons, divide the pounds per month by 2000.

ZLP 120 03-TV-032R2, 08/25/22

<sup>&</sup>lt;sup>(1)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(2)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

- C. The owner or operator shall demonstrate that, based on the coatings, thinners, and cleaning materials used in the surface coating of metal furniture, the organic HAP emission rate is less than the organic HAP limit of 0.83 lb/gal of coating solids, calculated as a monthly emission rate. This limit applies to all equipment at the facility that is used for the surface coating of metal furniture. Coating materials applied with hand-held non-refillable aerosol containers, touchup markers, or marking pens are not considered a coating for Subpart RRRR per the definition in §63.4981.
- D. The owner or operator shall follow one of the compliance options from §63.4891. At the present time, the facility is using the Emission rate without add-on controls option.
- E. The owner or operator shall meet all the requirements of §63.4951 and §63.4952. Each month following the initial compliance period is a compliance period.
- F. The owner or operator shall submit semiannual reports in accordance with §63.4920.
- G. The owner or operator shall keep records, as applicable, in accordance with §63.4930 and §63.4931.
- H. The owner or operator shall comply with all applicable work practice requirements from §63.803, *Work practice standards*.
- I. In accordance with §63.803 (e), *Chemical composition of cleaning and washoff solvents*, the owner or operator shall not use cleaning solvents that contain any of the pollutants listed in Table 4 of Subpart JJ in concentrations subject to MSDS reporting as required by OSHA.

Authority for Requirement: DNR Construction Permit 16-A-340

40 CFR 63 Subpart JJ 567 IAC 23.1(4)"aj" 40 CFR 63 Subpart RRRR 567 IAC 23.1(4)"cr"

## **NSPS/NESHAP Applicability:**

This facility manufacturers both wood furniture and metal furniture. This permit is for the cleaning solvents that are used on substrates and on equipment associated with the coating operations.

In the Wood Furniture Manufacturing NESHAP, (40 CFR Part 63, Subpart JJ), cleaning operations are defined in §63.801 as "operations in which organic HAP solvent is used to remove coating material or adhesives from equipment used in wood furniture manufacturing operations."

In the Metal Furniture Coating NESHAP, (40 CFR Part 63, Subpart RRRR), organic HAP emissions from cleaning solvents must be included in demonstrating compliance with the organic THAP emission limit of 0.10 kilogram per liter (0.83 lb/gal) of coating solids. The definition of coating operations in §63.4981 is "equipment used to apply cleaning materials to a substrate to prepare it for coating application or to remove dried or wet coating (surface preparation); to apply coating to a substrate (coating application) and to dry or cure the coating after application; and to clean coating operation equipment (equipment cleaning)." The definition of cleaning material in §63.4981 is "a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g. depainting), from a substrate before or after coating application or from equipment associated with a coating operation such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both."

ZLP 121 03-TV-032R2, 08/25/22

Authority for Requirement: DNR Construction Permit 16-A-340 40 CFR 63 Subpart JJ

567 IAC 23.1(4)"aj" 40 CFR 63 Subpart RRRR

567 IAC 23.1(4)"cr"

Monitoring Requirements
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The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Yes 🗌 No 🖂 Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂 Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂 **Compliance Assurance Monitoring (CAM) Plan Required?** 

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: 2640.DCW.1.EP.1**

## **Associated Equipment**

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
252.2640.DCW.1	Dryer #1 and Dryer #2 for sawdust & wood products and wood handling: 7 vacuum ports and 24 transfer points	5.8 tons wood/hr	Eshair Eller Desharra
252.1278.DPH.1	Natural Gas Burner	2.0 MMBTU/hr heat input	Fabric Filter Baghouse (2640.DCW.1.BGH)
252.1262.DPH.2	Natural Gas Burner	4.0 MMBTU/hr heat input	

Raw Material: Wood, Natural Gas

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 99-A-1044-S5

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 1.39 lb/hr

Authority for Requirement: DNR Construction Permit 99-A-1044-S5

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.78 lb/hr

Authority for Requirement: DNR Construction Permit 99-A-1044-S5

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 2.78 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permit 99-A-1044-S5

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 99-A-1044-S5

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permit 99-A-1044-S5

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

## Recordkeeping Requirements for the Facility-wide VOC limit.

- A. The VOC emission rate from all emission units at the HNI Corporation, North Campus shall not exceed 240.0 tons in any rolling 12 month period. This limit applies to permitted units, permit exempt units, and indoor vented units. This limit shall not include VOC emissions from fuel combustion sources, storage tanks, and stationary and portable internal combustion engines.
- B. The owner or operator shall maintain records on the identification and the VOC content of any material used at the facility except for the emission units specifically excluded in Construction Permit Condition.A. Safety Data Sheets or manufacturers' formulation sheets shall be maintained as a record for each material.
- C. The owner or operator shall maintain the following daily records for the liquid paint spray booths used for production painting:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

This condition does not apply to coatings applied by nonrefillable hand-held aerosol spray cans. This condition does not apply if no liquid paint spray booths for production painting are in operation at the facility.

- D. With the exception of the emission units excluded in Construction Permit Condition.A, to show compliance with the 240.0 tons per year VOC limit, the owner or operator shall maintain the following monthly records:
  - i. The identification of each VOC-containing material used at the facility.
  - ii. The amount, in gallons or pounds, of each VOC-containing material used at the facility. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

ZLP 124 03-TV-032R2, 08/25/22

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines.

- iii. The amount of other material used at the facility in pounds that, when processed, can cause or release VOC emissions. Examples of this material include powder coatings and resins used for plastic parts manufacturing.
- iv. The amount of VOC emissions from the facility, in tons.
- v. The 12-month rolling total of the amount of VOC emissions from the facility, in tons.

The owner or operator shall prepare these monthly records by the 30<sup>th</sup> day following the end of the month.

- E. These dryers (252.2640.DCW.1) are used to dry wood for the production of composite wood products. To estimate monthly VOC emissions due to the drying of wood, the owner or operator shall multiply the amount of dried wood produced by the dryers (252.2640.DCW.1) each month by the emission factor of 0.51 lbs VOC per ton of wood. The source of the emission factor is AP-42, Table 10.6.1-3 for a conveyor dryer (March 2002 update). To convert from pounds to tons, divide the pounds of emissions per month by 2000.
- F. With the exception of the emission units excluded in Construction Permit Condition.A, if the 12-month rolling total of the VOC emissions from the facility exceeds 192.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - i. The amount of VOC emissions from the facility, in tons.
  - ii. The 365-day rolling total of the amount of VOC emissions from the facility, in tons
  - iii. Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the facility drops below 192.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Condition.F. If the emissions once again exceed 192.0 tons, daily recordkeeping will be required per Construction Permit Condition.F.
- G. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site for each shipment of waste, and shall analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site. If non-VOC organic solvents are used at the facility (e.g. acetone), the facility shall perform an annual analysis on the amount of non-VOC organic solvents that are in the waste shipped off-site. Records shall be maintained on the date of this analysis and the results. Credit shall not be taken for the amount non-VOC organic solvents that are in the waste shipped off-site.

## **Requirements for NESHAP Subpart DDDD**

H. In accordance with §63.2252, because these emission units are not subject to a compliance option or work practice requirement specified in §63.2240, they are not subject to any other requirements from Subpart DDDD except for the initial notification requirements in §63.9(b).

#### **Other Operating Requirements**

- A. Dryers #1 and #2 shall only combust natural gas or propane. Prior to burning any other type of fuel in this emissions unit, the owner or operator shall apply to modify this construction permit.
- J. The baghouse's (2640.DCW.1.BGH) differential pressure drop shall be maintained between 0.6 and 2 inches water column.
- K. The owner or operator shall properly operate and maintain equipment to continuously monitor the differential pressure drop across the baghouse (2640.DCW.1.BGH). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
- L. The owner or operator shall collect and record the pressure drop across the baghouse (2640.DCW.1.BGH), in inches of water, once per day. If the pressure drop across the baghouse (2640.DCW.1.BGH) falls outside the range specified in Construction Permit Condition J., the owner or operator shall investigate the baghouse (2640.DCW.1.BGH) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the baghouse (2640.DCW.1.BGH) is not in operation.
- M. The owner or operator shall develop an operating and maintenance plan for the baghouse (2640.DCW.1.BGH), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
- N. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the baghouse (2640.DCW.1.BGH).

Authority for Requirement: DNR Construction Permit 99-A-1044-S5

40 CFR 63 Subpart DDDD 567 IAC 23.1(4)"cd"

ZLP 126 03-TV-032R2, 08/25/22

#### **NSPS/NESHAP Applicability:**

These emission units are subject to 40 CFR 63 Subpart DDDD National Emission Standard for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products.

This facility makes molded particleboard products. These emissions units, Wood Dryer #1 and Wood Dryer #2, are an affected source under §63.2232(b). Because these dryers are double pass horizontal web dryers and not one of the dryer types listed in Table 1A and Table 3 of Subpart DDDD, there are no applicable emission standards or work practice requirements from the subpart.

Authority for Requirement: DNR Construction Permit 99-A-1044-S5

40 CFR 63 Subpart DDDD 567 IAC 23.1(4)"cd"

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30 Stack Opening, (inches, dia.): 60 Exhaust Flow Rate (scfm): 63,555 Exhaust Temperature (°F): 80

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 99-A-1044-S5

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

Authority for Requirement: 567 IAC 22.108(3)

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required? (See Appendix B for CAM Plan)	Yes 🛛 No 🗌

ZLP 127 03-TV-032R2, 08/25/22

## Emission Point ID Numbers: 1262.IPH.1.EP.1, 1278.IPH.1.EP.1

## **Associated Equipment**

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
252.1262.IPH.1	Oil Heater	-	Natural Gas	3.0 MMBtu/hr	-
252.1278.IPH.1	Oil; Heater	-	Natural Gas	3.0 MMBtu/hr	-

# **Applicable Requirements**

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.6 lb/MMBtu

Authority for Requirement: IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppm<sub>v</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

## **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **NSPS/NESHAP Applicability:**

These units are subject to 40 CFR 63 Subpart DDDDD: *National Emission Standard for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers and Process Heaters* See Appendix A for the link to complete text of this standard

Authority for Requirement: 40 CFR 63 Subpart DDDDD

ZLP 128 03-TV-032R2, 08/25/22

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring	requirements listed
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: See Associated Equipment Table**

## **Associated Equipment**

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
1279 DDD 1 ED 1	252.1278.PPP.1	Compression Molding Wood Press #1	-	Wood & Resin	571.5 lbs/hr	99-A-1039-S3
1278.PPP.1.EP.1	252.1278.PPP.2	Compression Molding Wood Press #2	-	Wood & Resin	571.5 lbs/hr	99-A-1039- <b>3</b> 3
1278.PPP.2.EP.1	252.1278.PPP.3	Compression Molding Wood Press #3	-	Wood & Resin	571.5 lbs/hr	99-A-1041-S3
12/0.FFF.2.EF.1	252.1278.PPP.4	Compression Molding Wood Press #4	-	Wood & Resin	571.5 lbs/hr	99-A-1041-33
1278.PPP.3.EP.1	252.1278.PPP.5	Compression Molding Wood Press #5	-	Wood & Resin	571.5 lbs/hr	99-A-1043-S3
	252.1278.PPP.6	Compression Molding Wood Press #6	-	Wood & Resin	571.5 lbs/hr	77-A-1043-33

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table Associated Equipment

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.058 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table Associated Equipment

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.69 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table Associated Equipment

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.69 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table Associated Equipment

ZLP 130 03-TV-032R2, 08/25/22

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permits listed in Table Associated Equipment

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits listed in Table Associated Equipment

## **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. These emission units are used to form wood products by hot pressing a mixture of wood particles and resin into a formed shape. VOC emissions are caused by the curing of the resin in the press and by the use of a mold release spray. To estimate monthly VOC emissions due to the curing of the resin, the owner or operator shall multiply the amount of resin used in the wood presses (gallons) at the facility each month by the amount of VOC in the resin (lbs per gallon). To estimate monthly VOC emissions due to mold release application, the owner or operator shall multiply the amount of mold release used in the wood presses (gallons) at the facility each month by the amount of VOC in the mold release (lbs per gallon). To convert from pounds to tons, divide the pounds of VOC emissions per month by 2000.
- C. In accordance with §63.2252, because these emissions units are not subject to a compliance option or work practice requirement specified in §63.2240, they are not subject to any other requirements from Subpart DDDD except for the initial notification requirements in §63.9(b).

Authority for Requirement: DNR Construction Permits 99-A-1039-S3, 99-A-1041-S3,

99-A-1043-S3

40 CFR 63 Subpart DDDD 567 IAC 23.1(4)"cd"

<sup>&</sup>lt;sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

<sup>(3)</sup> Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

#### **NSPS/NESHAP Applicability:**

These emission units are subject to 40 CFR 63 Subpart DDDD National Emission Standard for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products.

This facility makes molded particleboard products. These emissions units are an affected source under §63.2232(b). Because these presses are for molding specific wood products (i.e. seats) and are not platen presses, they do not meet the definition of *Reconstituted wood product press* from §63.2292, and there are no applicable emission standards or work practice requirements.

Authority for Requirement: DNR Construction Permits 99-A-1039-S3, 99-A-1041-S3,

99-A-1043-S3

40 CFR 63 Subpart DDDD 567 IAC 23.1(4)"cd"

#### **Emission Point Characteristics**

These emission points shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 34.3

Stack Opening, (inches, dia.): 30 Exhaust Flow Rate (scfm): 8,000 Exhaust Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permits 99-A-1039-S3, 99-A-1041-S3,

99-A-1043-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: See Associated Equipment Table**

## **Associated Equipment**

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
1262.PPP.2.EP.1	252.1262.PPP.2	Compression Molding Wood Press #7	-	Wood & Resin	571.5 lbs/hr	01-A-244-S3
1262.PPP.4.EP.1	252.1262.PPP.4	Compression Molding Wood Press #8	-	Wood & Resin	571.5 lbs/hr	01-A-246-S3
1262.PPP.3.EP.1	252.1262.PPP.3	Compression Molding Wood Press #9	-	Wood & Resin	571.5 lbs/hr	01-A-247-S3
1262.PPP.1.EP.1	252.1262.PPP.1	Compression Molding Wood Press #10	-	Wood & Resin	571.5 lbs/hr	06-A-242-S2

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table: Associated Equipment

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.029 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.69 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.69 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table: Associated Equipment

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 240.0 tons/yr (2)

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

ZLP 133 03-TV-032R2, 08/25/22

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Total Hazardous Air Pollutants

Emission Limit(s): 0.10 kg/L of coating solids per compliance period (3)

Authority for Requirement: 567 IAC 23.1(4)"cr"

DNR Construction Permits listed in Table: Associated Equipment

<sup>(2)</sup> VOC limit is 240.0 tons in any rolling 12 month period and applies to all emissions unit at the North Campus excluding fuel combustion sources, storage tanks, and stationary and portable IC engines. Limit established so that the facility is a minor source for PSD.

(3) Organic THAP emissions shall not exceed 0.10 kilogram per liter (0.83 lb/gal) of coating solids used during each compliance period. Each calendar month is a compliance period.

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.
- B. These emission units are used to form wood products by hot pressing a mixture of wood particles and resin into a formed shape. VOC emissions are caused by the curing of the resin in the press and by the use of a mold release spray. To estimate monthly VOC emissions due to the curing of the resin, the owner or operator shall multiply the amount of resin used in the wood presses (gallons) at the facility each month by the amount of VOC in the resin (lbs per gallon). To estimate monthly VOC emissions due to mold release application, the owner or operator shall multiply the amount of mold release used in the wood presses (gallons) at the facility each month by the amount of VOC in the mold release (lbs per gallon). To convert from pounds to tons, divide the pounds of VOC emissions per month by 2000.
- C. In accordance with §63.2252, because these emission units are not subject to a compliance option or work practice requirement specified in §63.2240, they are not subject to any other requirements from Subpart DDDD except for the initial notification requirements in §63.9(b).

Authority for Requirement: DNR Construction Permits 01-A-244-S3, 01-A-246-S3,

01-A-247-S3, 06-A-242-S2 40 CFR 63 Subpart DDDD 567 IAC 23.1(4)"cd"

ZLP 134 03-TV-032R2, 08/25/22

#### **NSPS/NESHAP Applicability:**

These emission units are subject to 40 CFR 63 Subpart DDDD National Emission Standard for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products.

This facility makes molded particleboard products. These emission units are an affected source under §63.2232(b). Because these presses are for molding specific wood products (i.e. seats) and are not platen presses, it does not meet the definition of *Reconstituted wood product press* from §63.2292, and there are no applicable emission standards or work practice requirements.

Authority for Requirement: DNR Construction Permits 01-A-244-S3, 01-A-246-S3,

01-A-247-S3, 06-A-242-S2 40 CFR 63 Subpart DDDD 567 IAC 23.1(4)"cd"

#### **Emission Point Characteristics**

These emission points shall conform to the specifications listed below.

Characteristics	1262.PPP.2.EP.1	1262.PPP.4.EP.1	1262.PPP.3.EP.1	1262.PPP.1.EP.1
Stack Height, (ft, from the ground)	36.65	37.89	36.9	37.9
Exhaust Flow Rate (scfm)	8,000	8,000	8,000	8,000
Stack Opening, (inches, dia.)	30	30	30	30
Exhaust Temperature (°F)	70	70	70	70
Dischange Style	Vertical	Vertical	Vertical	Vertical
Discharge Style	Unobstructed	Unobstructed	Unobstructed	Unobstructed
Authority for Requirement (DNR Construction Permit)	01-A-244-S3	01-A-246-S3	01-A-247-S3	06-A-242-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 135 03-TV-032R2, 08/25/22

# **Emission Point ID Numbers: See Associated Equipment Table**

## Associated Equipment

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
1278.STH.1.EP.1	252.1278.STH.1	Manual Sanding Table Hood #1		Seats	58 pieces/hr	99-A-024-S3
12/8.51H.1.EP.1	252.1278.STH.2	Manual Sanding Table Hood #2	-	Seats	58 pieces/hr	
1278.STH.2.EP.1	252.1278.STH.3	Manual Sanding Table Hood #3	_	Seats	58 pieces/hr	99-A-1040-S3
12/8.S1H.2.EP.1	252.1278.STH.4	Manual Sanding Table Hood #4		Seats	58 pieces/hr	
1278.STH.3.EP.1	252.1278.STH.5	Manual Sanding Table Hood #5		Seats	58 pieces/hr	99-A-1042-S3
12/0.51H.3.EP.1	252.1278.STH.6	Manual Sanding Table Hood #6	_	Seats	58 pieces/hr	99-A-1042-33

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits listed in Table: Associated Equipment

Pollutant: Particulate Matter (PM<sub>2.5</sub>) Emission Limit(s): 0.028 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Pollutant: Particulate Matter (PM<sub>10</sub>) Emission Limit(s): 0.45 lb/hr

Authority for Requirement: DNR Construction Permits listed in Table: Associated Equipment

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 0.45 lb/hr Authority for Requirement: IAC 23.3(2)"a"

DNR Construction Permits listed in Table: Associated Equipment

ZLP 136 03-TV-032R2, 08/25/22

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

#### Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. This permit is for manual sanders that are used to sand composite wood products. This permit does not establish any operating limits or recordkeeping requirements.
- B. In accordance with §63.2252, because these emission units are not subject to a compliance option or work practice requirement specified in §63.2240, they are not subject to any other requirements from Subpart DDDD except for the initial notification requirements in §63.9(b).

#### **NSPS/NESHAP Applicability:**

These emission units are subject to 40 CFR 63 Subpart DDDD National Emission Standard for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products.

The emission units are an affected source under §63.2232(b) as a miscellaneous finishing operation. However, the manual sanders have no emission limits, work practice requirements or other requirements from Subpart DDDD.

Authority for Requirement: DNR Construction Permits 99-A-024-S3, 99-A-1040-S3,

99-A-1042-S3

40 CFR 63 Subpart DDDD

567 IAC 23.1(4)"cd"

#### **Emission Point Characteristics**

The emission points shall conform to the specifications listed below.

Characteristics	1278.STH.1.EP.1	1278.STH.2.EP.1	1278.STH.3.EP.1	
Stack Height, (ft, from the ground)	35.94	33.75	33.75	
Exhaust Flow Rate (scfm)	5,200	5,200	5,200	
Stack Opening, (inches, dia.)	24	24	24	
Exhaust Temperature (°F)	70	70	70	
Disabarga Styla	Vertical	Vertical	Vertical	
Discharge Style	Unobstructed	Unobstructed	Unobstructed	
Authority for Requirement (DNR Construction Permit)	99-A-024-S3	99-A-1040-S3	99-A-1042-S3	

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring	g requirements listed
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

ZLP 138 03-TV-032R2, 08/25/22

## **Emission Point ID Number: 252.SUAero.F**

## **Associated Equipment**

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 252.252.SUAero

Emissions Control Equipment ID Number: N/A Emissions Control Equipment Description: N/A Continuous Emissions Monitors ID Numbers: N/A

Emission Unit vented through this Emission Point: 252.252.SUAero Emission Unit Description: Misc. Production Aerosols – Geneva Annex

Raw Material/Fuel: Aerosols

Rated Capacity: N/A

# **Applicable Requirements**

## **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: See Associated Equipment Table**

**Associated Equipment** 

<b>Emission Point</b>	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
252.BlowMolder	252.BlowMolder	Blow Molding	-	Plastic Pellets	400 lbs/hr	-
252.IMLD.F	252.252.IMLD	Plastic Injection Molding	-	Plastic Pellets	50 lbs/hr	-

# **Applicable Requirements**

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

A. See Plant Wide Conditions Section of this permit for reporting and recordkeeping requirements for the 240.0 ton/yr VOC facility wide limit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 140 03-TV-032R2, 08/25/22

## IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

#### **G1.** Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a 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 the permit. 567 IAC 22.108 (9)"b"
- 6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. 567 IAC 22.108(15)"c"

## **G2. Permit Expiration**

- 1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

## G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

ZLP 141 03-TV-032R2, 08/25/22

#### **G4.** Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

# **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

#### **G6.** Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
- 4. The fee shall be submitted annually by July 1 with forms specified by the department.
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

#### G7. Inspection of Premises, Records, Equipment, Methods and Discharges

ZLP 142 03-TV-032R2, 08/25/22

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

## **G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

# **G9.** General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

# G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

ZLP 143 03-TV-032R2, 08/25/22

- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

## G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

- 1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
  - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
  - b. Compliance test methods specified in 567 Chapter 25; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

# G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

#### G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

## G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the

ZLP 144 03-TV-032R2, 08/25/22

incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

# 2. Excess Emissions Reporting

- a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:
  - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
  - ii. The estimated quantity of the excess emission.
  - iii. The time and expected duration of the excess emission.
  - iv. The cause of the excess emission.
  - v. The steps being taken to remedy the excess emission.
  - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
  - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
  - ii. The estimated quantity of the excess emission.
  - iii. The time and duration of the excess emission.
  - iv. The cause of the excess emission.
  - v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.

ZLP 145 03-TV-032R2, 08/25/22

- vi. The steps that were taken to limit the excess emission. vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The facility at the time was being properly operated;
  - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
  - d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. 567 IAC 22.108(16)

#### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

# **G16.** Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

# G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

ZLP 146 03-TV-032R2, 08/25/22

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 22.144(455B));
  - e. The changes comply with all applicable requirements.
  - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
    - i. A brief description of the change within the permitted facility,
    - ii. The date on which the change will occur,
    - iii. Any change in emission as a result of that change,
    - iv. The pollutants emitted subject to the emissions trade
    - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
    - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
    - vii. Any permit term or condition no longer applicable as a result of the change.  $567 \, IAC \, 22.110(1)$
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

## G18. Duty to Modify a Title V Permit

#### 1. Administrative Amendment.

- a. An administrative permit amendment is a permit revision that does any of the following:
  - i. Correct typographical errors
  - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - iii. Require more frequent monitoring or reporting by the permittee; or
  - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

#### 2. Minor Title V Permit Modification.

- a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:
  - i. Do not violate any applicable requirement;
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
  - iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
  - v. Are not modifications under any provision of Title I of the Act; and vi. Are not required to be processed as significant modification under rule 567 22.113(455B).
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
  - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
  - ii. The permittee's suggested draft permit;
  - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

ZLP 148 03-TV-032R2, 08/25/22

- iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

# 3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.111-567 IAC 22.113

ZLP 149 03-TV-032R2, 08/25/22

#### **G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. 567 IAC 22.1(1)

#### G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (567 IAC 23.1(3)"a"); training fires and controlled burning of a demolished building (567 IAC 23.2).

### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. 567 IAC 23.2 <u>except</u> 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only

# G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

## G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

ZLP 150 03-TV-032R2, 08/25/22

- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

## **G24. Permit Reopenings**

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
  - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"
- 3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;

ZLP 151 03-TV-032R2, 08/25/22

- b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
- c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
- d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)
- 5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. 567 IAC 22.114(3)

#### **G25. Permit Shield**

- 1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
  - a. Such applicable requirements are included and are specifically identified in the permit; or
  - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
- 3. A permit shield shall not alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
  - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 22.108 (18)

#### **G26.** Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to

ZLP 152 03-TV-032R2, 08/25/22

other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

# **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

# **G28.** Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of 567 IAC 22.111(1). 567 IAC 22.111(1)"d"

ZLP 153 03-TV-032R2, 08/25/22

#### G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau Wallace State Office Building 502 E 9<sup>th</sup> St.
Des Moines, IA 50319-0034 (515) 725-9545

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 25.1(7)"a", 567 IAC 25.1(9)

#### G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

ZLP 154 03-TV-032R2, 08/25/22

#### **G32.** Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer

Air Branch

Enforcement and Compliance Assurance Division

U.S. EPA Region 7

11201 Renner Blvd.

Lenexa, KS 66219

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau

Iowa Department of Natural Resources

Wallace State Office Building

502 E 9<sup>th</sup> St.

Des Moines, IA 50319-0034

(515) 725-8200

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

#### Field Office 1

1101 Commercial Court, Suite 10 Manchester, IA 52057 (563) 927-2640

#### Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

#### Field Office 5

Wallace State Office Building 502 E 9<sup>th</sup> St. Des Moines, IA 50319-0034 (515) 725-0268

## **Polk County Public Works Dept.**

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

#### Field Office 2

2300-15th St., SW Mason City, IA 50401 (641) 424-4073

#### Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

#### Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

#### **Linn County Public Health**

Air Quality Branch 1020 6<sup>th</sup> Street SE Cedar Rapids, IA 52401 (319) 892-6000

# **Appendix A: Web Link References**

**40 CFR 63 Subpart RRRR: NESHAP Surface Coating of Metal Furniture** http://www.ecfr.gov/cgi-bin/text-idx?node=sp40.13.63.rrrr

**40 CFR 63 Subpart JJ: NESHAP Wood Furniture Manufacturing Operations** <a href="http://www.ecfr.gov/cgi-bin/text-idx?node=sp40.11.63.jj">http://www.ecfr.gov/cgi-bin/text-idx?node=sp40.11.63.jj</a>

**40 CFR 63 Subpart DDDD: NESHAP Plywood and Composite Wood Products** http://www.ecfr.gov/cgi-bin/text-idx?node=sp40.13.63.dddd

**40 CFR 63 Subpart ZZZZ: NESHAP Stationary Reciprocating Internal Combustion Engines** http://www.ecfr.gov/cgi-bin/text-idx?node=sp40.14.63.zzzz

40 CFR 63 Subpart DDDDD: NESHAP Industrial, Commercial and Institutional Boilers and Process Heaters

http://www.ecfr.gov/cgi-bin/text-idx?node=sp40.14.63.ddddd

ZLP 156 03-TV-032R2, 08/25/22

# Appendix B: Agency O & M Plan for Baghouses

# Plan for PM and PM<sub>10</sub> Control

Emission Point	Emission Unit	Control Equipment	Control Equipment Description	PM Limit (lb/hr)	Construction Permit
1237.DCW.1.IV.1	200.1237.DCW.1	1237.DCW.1.BGH	Fabric Filter Baghouse <sup>(1)</sup>	1.02	16-A-426
1300.DCW.1.EP.1	200.1300.DCW.1	1300.DCW.1.BGH	Fabric Filter Baghouse <sup>(1)</sup>	2.2	98-A-677-S3
1300.DCW.2.EP.1	200.1300.DCW.2	1300.DCW.2.BGH	Fabric Filter Baghouse <sup>(1)</sup>	2.2	98-A-678-S3
	252.1278.DPH.1				
2640.DCW.1.EP.1	252.1262.DPH.2	2640.DCW.1.BGH	Fabric Filter Baghouse	2.78	99-A-1044-S5
	252.2640.DCW.1				

<sup>(1)</sup> Vents inside building therefore not subject to Indicator #2 – Visible Emissions

## I. Background

Baghouses are used to control particulate emissions from these emission points. The potential uncontrolled emissions from these emission units are greater than the major source threshold for PM. These baghouses are used to achieve compliance with the referenced emission limits.

## II. Monitoring Approach

	Indicator #1 – Pressure Drop	<b>Indicator</b> #2 - Visible Emissions <sup>(1)</sup>
Measurement Approach	The owner or operator shall collect and	Visible emissions from baghouse
	record the pressure drop across the	exhaust while the baghouse is
	baghouse, in inches of water, once per	operating.
	day.	
Indicator Range	The baghouse differential pressure	An excursion is defined as any
	drop shall be maintained between 1	visible emission occurring.
	and 4 inches water column. If the	Excursions trigger an inspection,
	pressure drop across the baghouse falls	corrective action and a reporting
	outside this range the owner or	requirement.
	operator shall investigate the baghouse	
	and make corrections to it. The owner	
	or operator shall maintain a record of	
	all corrective actions taken.	

ZLP 157 03-TV-032R2, 08/25/22

# III. Performance Criteria

	Indicator #1 – Pressure Drop	<b>Indicator #2</b> - Visible Emissions <sup>(1)</sup>
Data Representativeness	The owner or operator shall properly operate and maintain equipment to continuously monitor the differential pressure drop across the baghouse.	Visible emissions observations are made at the emission point and on the external baghouse unit, system ductwork and associated components.
Verification of Operational Status	The owner or operator shall develop an operating and maintenance plan for the baghouse, including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.	Not applicable
QA/QC Practices and Criteria	The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required. After any necessary corrective action has been taken, a follow-up check will be performed to ensure that the indicator is within the indicator range.	When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required. After any necessary corrective action has been taken, a follow-up check will be performed to ensure that the indicator is within the indicator range.
Monitoring Frequency	The owner or operator shall collect and record the pressure drop across the baghouse, in inches of water, once per day while the baghouse is operating.	Visible emission observations will be performed weekly on the baghouse and associated components.
Data Collection Procedures	Records of the pressure drop readings shall be kept for a minimum of 5 years. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the baghouse.	Results of visible emission observations will be recorded in the dust collector maintenance Records of the visible emission observations readings shall be kept for a minimum of 5 years.

<sup>&</sup>lt;sup>(1)</sup>Indicator #2 – Visible Emissions does not apply to the Baghouses that vent inside the building.