



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: October 16, 2007  
RE: David R. Webb / 081-12122-00014  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

---

Mitchell E. Daniels, Jr.  
 Governor

Thomas W. Easterly  
 Commissioner

100 North Senate Avenue  
 MC 61-53 IGCN 1003  
 Indianapolis, Indiana 46204-2251  
 (317) 232-8603  
 (800) 451-6027  
 www.IN.gov/idem

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

**David R. Webb Co., Inc.  
 206 South Holland Street  
 Edinburgh, Indiana 46124**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

Operation Permit No.: F081-12122-00014	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 16, 2007  Expiration Date: October 16, 2012



<b>SECTION A</b>	<b>SOURCE SUMMARY</b> .....	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b> .....	7
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3.2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	17
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	
	<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.9	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]</b>	

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Maintenance of Opacity Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.16 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**One (1) wood-fired boiler..... 24**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.1 Particulate [326 IAC 6-2-2]
- D.1.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

**Compliance Determination Requirements**

- D.1.3 Particulate Control

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.1.4 Visible Emissions Notations
- D.1.5 Parametric Monitoring
- D.1.6 Cyclone Failure Detection

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.1.7 Record Keeping Requirements
- D.1.8 Reporting Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**One (1) wood-fired boiler ..... 27**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.2.1 Particulate [40 CFR 60.40c]
- D.2.2 Particulate [326 IAC 6-2-4]
- D.2.3 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

**Compliance Determination Requirements**

- D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]
- D.2.5 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.2.6 Visible Emissions Notations
- D.2.7 Parametric Monitoring
- D.2.8 Cyclone Failure Detection
- D.2.9 Electrostatic (ESP) Monitoring [326 IAC 2-8-5(a) (1)] [326 IAC 2-8-4]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.2.10 Record Keeping Requirements

D.2.11 Reporting Requirements

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**A woodworking operation ..... 30**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.3.1 Particulate [326 IAC 6-3-2]

D.3.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

D.3.3 Particulate Matter (PM)

D.3.4 Visible Emissions Notations

D.3.5 Baghouse Inspections

D.3.6 Broken or Failed Bag Detection

D.3.7 Cyclone Inspections

D.3.8 Cyclone Failure Detection

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.3.9 Record Keeping Requirements

**SECTION D.4 FACILITY OPERATION CONDITIONS**

**A parts cleaning operation ..... 33**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

**Certification Form ..... 35**

**Emergency Occurrence Form ..... 36**

**Natural Gas Fired Boiler Certification ..... 38**

**Quarterly Report Form ..... 39**

**Quarterly Deviation and Compliance Monitoring Report Form ..... 40**

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary veneer manufacturing plant.

---

Source Address:	205 South Holland Street, Edinburgh, Indiana, 46124
Mailing Address:	206 South Holland Street, Edinburgh, Indiana, 46124
General Source Phone:	812/526-2601
SIC Code:	2435
Source Location Status:	Johnson
Source Status:	Nonattainment for PM2.5 Basic nonattainment for Ozone under the 8 hour standard Attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, under Emission Offset Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

---

- (a) One (1) wood-fired boiler, identified as Boiler 01, constructed in 1977, with a maximum heat input capacity of 38 MMBtu per hour, using a multiclone separator as control, exhausting to stack S1, and used only as a back-up boiler or when Boiler 02 is firing natural gas;
- (b) One (1) wood-fired boiler with a natural gas back-up burner, identified as Boiler 02, constructed in January of 1993, with maximum heat input capacities of 60 MMBtu per hour when burning wood and 22.6 MMBtu per hour when burning natural gas, using a multiclone separator in line with an electrostatic precipitator as control, equipped with a continuous opacity monitor, and exhausting to stack S2; and
- (c) A woodworking operation consisting of hogging, debarking, and sawing, identified as 03, with a maximum capacity of 36000 board feet (bdft) per day, including an integral system consisting of three (3) cyclones and using (1) baghouse as particulate control, and exhausting to stack S3.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(l)]

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

---

- (a) A parts cleaning operation, identified as 05, with a maximum capacity of 35 gallons per year, and exhausting to stacks 23 and 24;

- (b) Five (5) veneer dryers, each emitting less than 2.5 tons per year of a combination of HAPs, identified as dryer 1 through dryer 5, and exhausting to the following stacks:
  - (1) dryer 1 is exhausting to stacks 1 through 6.
  - (2) dryer 2 is exhausting to stacks 7 through 10.
  - (3) dryer 3 is exhausting to stacks 11 through 15.
  - (4) dryer 4 is exhausting to stacks 16 through 19.
  - (5) dryer 5 is exhausting to stacks 20 through 22.
  
- (c) Other categories with emissions below insignificant thresholds:
  - (1) Welding operations with PM-10 emission less than twenty-five (25) pounds per day:
    - (A) Three (3) MIG welders.
    - (B) Six (6) stick welders.
    - (C) One (1) TIG welder.
    - (D) Five (5) oxyacetylene flame-cutting operations.
    - (E) One (1) Plasma cutter.

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

---

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

---

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]**

---

- (a) This permit, F081-12122-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

---

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-8-6]**

---

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6 Severability [326 IAC 2-8-4(4)]**

---

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

---

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

---

- (a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

---

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the Δauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1 6 3. At a minimum, the PMPs shall include:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the Δauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP's do not require the certification by the Δauthorized individual@ as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-0178 (ask for Compliance Section)  
Facsimile No.: 317-233-6865
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
within two (2) working days of the time when emission limitations were exceeded due to the emergency.  
  
The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:
    - (A) A description of the emergency;
    - (B) Any steps taken to mitigate the emissions; and
    - (C) Corrective actions taken.The notification which shall be submitted by the Permittee does not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).
- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an

- emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
      - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
      - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of previous permits established prior to F081-12122-00014 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the authorized individual as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).
- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

---

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1] [IC 13-17-3.2]**

---

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (PSD);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

**Testing Requirements [326 IAC 2-8-4(3)]**

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

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

## **Compliance Requirements [326 IAC 2-1.1-11]**

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

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

---

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COMS shall be in operation at all times that the induced draft fan is in operation.
- (b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.

- (1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
  - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
  - (3) Method 9 readings may be discontinued once a COMS is online.
  - (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, (and 40 CFR 60 and/or 40 CFR 63).

**C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

---

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

---

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

**C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;

- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

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

### **C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

---

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the Aauthorized individual@ as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the Aauthorized individual@ as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified in this permit. For the purpose of this permit Acalendar year@ means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) wood-fired boiler, identified as Boiler 01, constructed in 1977, with a maximum heat input capacity of 38 MMBtu per hour, using a multicclone separator as control, exhausting to stack S1;

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

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

#### D.1.1 Particulate [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 38 MMBtu per hour heat input boiler shall be limited to 0.49 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

where: Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)  
Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 38 MMBtu/hr

#### D.1.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from the 38 MMBtu per hour boiler and 60 MMBtu per hour boiler (Boiler 01 and Boiler 02), shall not exceed 0.97 pounds per ton.
- (b) the input of wood in the 38 MMBtu per hour boiler and 60 MMBtu per hour boiler combined shall be limited to less than 60,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) For purposes of determining compliance, every million cubic feet (MMCF) of natural gas burned shall be equivalent to 1.247 tons of wood fuel based on PM-10 emissions, such that the total tons of wood fuel, plus equivalent wood fuel input does not exceed the limit specified.

Compliance with these requirements shall limit the source-wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. The requirements of 326 IAC 2-2 (PSD) are also not applicable.

### Compliance Determination Requirements

#### D.1.3 Particulate Control

In order to comply with D.1.1 and D.1.2, the multicclone for PM and PM-10 control shall be in operation and

control emissions from the boiler at all times when Boiler 01 is in operation.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.1.4 Visible Emissions Notations**

---

- (a) Visible emission notations of the No. 01 boiler stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

---

The Permittee shall record the pressure drop across the multiclone used in conjunction with the boiler, at least once per day when the boiler is in operation. When for any one reading, the pressure drop across the multiclone is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.1.6 Cyclone Failure Detection**

---

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.7 Record Keeping Requirements**

---

- (a) To document compliance with D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below:

- (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel usage since last compliance determination period; and
  - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period;
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain once per day records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

---

A quarterly summary certifying the amount of fuel burned in D.1.2, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) wood-fired boiler with a natural gas back-up burner, identified as Boiler 02, constructed in January of 1993, with maximum heat input capacities of 60 MMBtu per hour when burning wood and 22.6 MMBtu per hour when burning natural gas, using a multiclone separator in line with an electrostatic precipitator as control, equipped with a continuous opacity monitor, and exhausting to stack S2; and

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

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

#### D.2.1 Particulate Matter (PM) [40 CFR 60.40c]

Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The PM emissions from the sixty (60) MMBtu per hour wood-fueled boiler shall not exceed one tenth (0.1) pound per million Btu heat input; and
- (b) Opacity shall not exceed twenty percent (20%) in any one (1) six (6) minute averaging period, except for one six (6) minute period per hour of not more than twenty-seven percent (27%) opacity.

Pursuant to 40 CFR 60 Subpart Dc, the PM and opacity limit applies at all times, except periods of startup, shutdown, and malfunction.

#### D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the No. 02 boiler shall be limited to 0.33 pounds per MMBtu heat input when combusting wood and limited to 0.37 pounds per MMBtu heat input when combusting natural gas.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input  
Q = total source max. indirect heat input = 98 MMBtu/hr when combusting wood and 60.6 MMBtu/hr when combusting natural gas

#### D.2.3 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from the 38 MMBtu per hour boiler and 60 MMBtu per hour boiler (Boiler 01 and Boiler 02), shall not exceed 0.97 pounds per ton.

- (b) the input of wood in the 38 MMBtu per hour boiler and 60 MMBtu per hour boiler combined shall be limited to less than 60,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, so that PM-10 emissions are limited below 100 tons per year.
- (c) For purposes of determining compliance, every million cubic feet (MMCF) of natural gas burned shall be equivalent to 1.247 tons of wood fuel based on PM-10 emissions, such that the total tons of wood fuel, plus equivalent wood fuel input does not exceed the limit specified.

Compliance with these requirements shall limit the source-wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. The requirements of 326 IAC 2-2 (PSD) are also not applicable.

### **Compliance Determination Requirements**

#### **D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

---

- (a) To demonstrate compliance with Conditions D.2.1, D.2.2 and D.2.3, PM and PM-10 testing in accordance with 40 CFR 60.45c, Subpart Dc, is required for wood burning to show compliance with 40 CFR 60.40c, Subpart Dc.
- (b) Within 180 days after issuance of this permit, the Permittee shall perform CO testing utilizing methods as approved by the Commissioner to verify that the emissions from this unit is less than or equal to 57.4 tons per year . Testing shall be conducted in accordance with Section C - Performance Testing.

#### **D.2.5 Particulate Control**

---

In order to comply with D.2.1, D.2.2 and D.2.3, the multiclone and the electrostatic precipitator for PM and PM-10 control shall be in operation and control emissions from the boiler at all times when Boiler 02 is in operation.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] [40 CFR 60.40c]**

#### **D.2.6 Parametric Monitoring**

---

The Permittee shall record the pressure drop across the multiclone used in conjunction with the boiler, at least once per day when the boiler is in operation. When for any one reading, the pressure drop across the multiclone is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.2.7 Cyclone Failure Detection**

---

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or

Exceedances, shall be considered a deviation from this permit.

**D.2.8 Electrostatic (ESP) Monitoring [326 IAC 2-8-5(a) (1)] [326 IAC 2-8-4]**

---

- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit is in operation, by measuring and recording the number of transformer rectifier (T-R) sets in service and the primary and secondary voltages and the currents of the T-R sets.
- (b) Reasonable response steps shall be taken in accordance with Section C - Response to Excursions or Exceedances whenever the percentage of T-R sets in service falls below ninety percent (90%). T-R set failure resulting in less than ninety percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.9 Record Keeping Requirements [40 CFR 60.40c]**

---

- (a) To document compliance with D.2.3, the Permittee shall maintain records in accordance with (1) through (2) below:
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel usage since last compliance determination period;
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain once per day records of the pressure drop during normal operation. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain weekly records of the primary and secondary amperage and T-R set voltage of the ESP at a level which has been demonstrated by performance test. The Permittee shall include in its weekly record when the primary and secondary amperage and T-R set voltage readings are not taken and the reason for the lack of the primary and secondary amperage and T-R set voltage readings (e.g. the process did not operate that week).
- (d) To document compliance with Condition D.2.1, the Permittee shall perform record keeping and reporting as required by Subpart Dc, including performance test data, performance evaluation of the COMS, excess emission reports, and the daily amount of fuel combusted during every six month reporting period.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.11 Reporting Requirements**

---

- (a) The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

- (b) A quarterly summary of the information to document compliance with Condition D.2.3(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

### SECTION D.3 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-8-4(10)]:

- (c) A woodworking operation consisting of hogging, debarking, and sawing, identified as 03, with a maximum capacity of 36000 board feet (bdft) per day, including an integral system consisting of three (3) cyclones and using (1) baghouse as particulate control, and exhausting to stack S3.

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

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

##### D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 21.67 pounds per hour when operating at a process weight rate of 12 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

##### D.3.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8 (FESOP) the PM-10 emissions from the woodworking operation, shall not exceed 12.56 pounds per hour, which is equivalent to 55.0 tons per year. Compliance with this requirement shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. The requirements of 326 IAC 2-2 are also not applicable.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

##### D.3.3 Particulate Control

- (a) In order to comply with D.3.1 and D.3.2, the three (3) cyclones and one (1) baghouse for PM and PM-10 control shall be in operation and control emissions from the woodworking processes at all times that the woodworking processes are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will

continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.3.4 Visible Emissions Notations

---

- (a) Daily visible emission notations of the cyclones and baghouse stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.3.5 Baghouse Inspections

---

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

#### D.3.6 Broken or Failed Bag Detection

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### D.3.7 Cyclone Inspections

---

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

of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### D.3.8 Cyclone Failure Detection

---

In the event that cyclone failure has been observed:

Failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.3.9 Record Keeping Requirements

---

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Conditions D.3.5 and D.3.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.3.5 and D.3.7, and the dates the vents are redirected. The Permittee shall include in its quarterly record when an inspection is not performed and the reason for the lack of an inspection (e.g. the process did not operate that quarter).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Insignificant Activity

- (a) A parts cleaning operation, identified as 05, with a maximum capacity of 35 gallons per year, and exhausting to stacks 23 and 24; and

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

### Degreasing Operations

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

##### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

##### D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: David R. Webb Co., Inc.  
Source Address: 205 South Holland Street, Edinburgh, Indiana 46124  
Mailing Address: 206 South Holland Street, Edinburgh, Indiana 46124  
FESOP No.: F081-12122-00014

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: David R. Webb Co., Inc.  
Source Address: 205 South Holland Street, Edinburgh, Indiana 46124  
Mailing Address: 206 South Holland Street, Edinburgh, Indiana 46124  
FESOP No.: F081-12122-00014

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)  
XThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and  
XThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

**Page 2 of 2**

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

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

A certification is not required for this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: David R. Webb Co., Inc.  
Source Address: 205 South Holland Street, Edinburgh, Indiana 46124  
Mailing Address: 206 South Holland Street, Edinburgh, Indiana 46124  
FESOP No.: F081-12122-00014

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

Report period  
Beginning: \_\_\_\_\_  
Ending: \_\_\_\_\_

<u>Boiler Affected</u>	<u>Alternate Fuel</u>	<u>Days burning alternate fuel</u>	
		<u>From</u>	<u>To</u>

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

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: David R. Webb Co., Inc.  
 Source Address: 205 South Holland Street, Edinburg, Indiana 46124  
 Mailing Address: 206 South Holland Street, Edinburg, Indiana 46124  
 FESOP No.: F081-12122-00014  
 Facility: Both boiler 01 and boiler 02  
 Parameter: PM-10  
 Limit: The input of wood, plus equivalent wood equivalent in the 38 MMBtu per hour boiler (boiler 01) and 60 MMBtu per hour boiler (boiler 02) combined shall be limited to 60,000 tons of wood per twelve (12) consecutive month period, with compliance determined at the end of each month.  
 For purposes of determining compliance, every million cubic feet (MMCF) of natural gas burned shall be equivalent to 1.247 tons of wood fuel based on PM-10 emissions, such that the total tons of wood fuel, plus equivalent wood fuel input does not exceed the limit specified.

YEAR:

Month	Column 1			Column 2	Column 1 + Column 2
	Amount of wood burned this month (tons)	Amount of natural gas burned this month (tons)	Total wood equivalent this month (tons)	Amount of wood and equivalent burned previous 11 months (tons)	Amount of wood and equivalent burned 12 month total (tons)
Month 1					
Month 2					
Month 3					

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

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

Attach a signed certification to complete this report.

## OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: David R. Webb Co., Inc.  
Source Address: 205 South Holland Street, Edinburgh, Indiana 46124  
Mailing Address: 206 South Holland Street, Edinburgh, Indiana 46124  
FESOP No.: F081-12122-00014

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked <b>Δ</b>No deviations occurred this reporting period@.</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

Page 2 of 2

--

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

**Source Name:** David R. Webb Co., Inc.  
**Source Location:** 205 South Holland Street, Edinburgh, Indiana, 46124  
**SIC Code:** 2435  
**County:** Johnson  
**Operation Permit No.:** F081-12122-00014  
**Permit Reviewer:** Alic Bent /EVP

On June 6, 2002, the Office of Air Quality (OAQ) had a notice published in the Daily Journal, Franklin, Indiana, stating that David R. Webb Co., Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) for the operation of a veneer manufacturing plant. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On July 8, 2002, Chad E. Wiech, Environmental and Safety Manager of Danzer Services, Inc. submitted comments on behalf of David R. Webb Co., Inc. on the proposed FESOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

On April 7, 2005, David R. Webb also submitted a five (5) year fuel usage report for the period 2000 to 2004 showing a breakdown of (i) the total amount and cost of wood purchased to supplement the wood fuel used in the wood-fired boiler; (ii) the total amount of wood generated from the woodworking operation in tons; and (iii) the total amount of wood fuel generated from the woodworking operations used in the wood-fired boilers. For the five (5) year period, 2000 to 2004, (i) the total amount of wood waste purchased to supplement the wood fuel used in the wood-fired boiler was 11,833 tons and the cost was free; (ii) the total amount of wood fuel generated from the woodworking operations was 86,233 tons; and (iii) the total amount of wood fuel generated from the woodworking operations used in the wood-fired boilers was also 86,233 tons. The estimated cost to use natural gas rather than wood waste to fire the boilers was \$1,765,000 for 2004.

### Comment #1

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

The three cyclones and one baghouse are a part of the woodworking operation and are not emission control devices. They are part of the system to capture and control wood waste to produce fuel to operate the site.

### Response #1

Based on current IDEM and U.S. EPA guidance of November 17, 1995 for woodworking processes, one of the following listed criteria must be met for the dust collector to be considered integral:

1. The process can not operate without the control device.
2. The control device serves a primary purpose other than control.

3. The control device has an overwhelming positive net economic effect.

The source's justification for controls being integral are:

1. Entire process is dependent on the cyclones and baghouse operating because this is their fuel collection system.
2. Boilers are fired by wood or natural gas.
3. Boilers generate steam that is necessary for drying and cooking the wood in the process.
4. Financially the source can't afford to operate without using their own wood waste as fuel.

IDEM, OAQ has evaluated the justifications and agreed that the primary purpose of the three (3) cyclones is to recover woodwaste for use as fuel. Therefore, the three (3) cyclones are considered integral to the woodworking process. However, IDEM, OAQ has determined that the baghouse does not serve as a necessary component of the woodworking process and was added to the source for the primary purpose of controlling air pollutant emissions. Therefore, the baghouse is not considered as an integral part of the woodworking process. The permitting level is determined using the potential to emit after the three (3) cyclones (see Appendix A of the ATSD: page 2 of 2). Sections A.2 and D.3 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (c) A woodworking operation consisting of hogging, debarking, and sawing, identified as 03, with a maximum capacity of 36,000 board feet (bdft) per day, **including an integral system consisting of using** three (3) cyclones and **using** (1) baghouse as **particulate** control, and exhausting to stack S3.

**SECTION D.3**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

- (c) A woodworking operation consisting of hogging, debarking, and sawing, identified as 03, with a maximum capacity of 36,000 board feet (bdft) per day, **including an integral system consisting of using** three (3) cyclones and **using** (1) baghouse as **particulate** control, and exhausting to stack S3.

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

**Comment #2**

Condition A.5 Prior Permit Superseded

It is not clear that 326 IAC 2-1.1-9.5 authorizes this permit condition. Moreover, even if 326 IAC 2-1.1-9.5 does authorize this permit condition, this permit condition should be modified to identify all previous permits that were issued pursuant to permitting programs approved into the state implementation plan that have been incorporated as originally stated, revised or deleted by the FESOP.

**Response #2**

The Technical Support Document (TSD) has a section for existing approvals, under which all previous approvals are listed. This section includes a statement that the conditions from those approvals except otherwise identified have been incorporated in the FESOP. The conditions which were determined to be non-applicable or which conditions were otherwise revised are shown separately. There are no changes to the permit as a result of this comment.

### Comment #3

#### B.10 Compliance with Permit Conditions

This condition requires that Webb must comply with all conditions in the permit. However, a number of the permit conditions do not impose any compliance obligation such as Conditions A.1, B.4, B.5, B.6, or B. 7 to name a few. Therefore, this condition should be revised to specifically identify which of the permit conditions in the FESOP are subject to this compliance condition.

### Response #3

IDEM has determined that it is the responsibility of the Permittee to identify the enforceable conditions, including all applicable federal rules and state implementation plan, with which the Permittee must comply and that it is not necessary to revise this condition to specifically identify each condition subject to this compliance condition. However, IDEM is aware that noncompliance with conditions that are not federally enforceable may not constitute a violation of the Clean Air Act. Therefore, IDEM has clarified this condition to indicate that "Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act".

Condition B.10 (Compliance with Permit Conditions) has also been removed from the B section and has been added to the FESOP title page instead. All the subsequent Section B conditions have been re-numbered.

#### ~~B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; and~~

~~(3) Denial of a permit renewal application.~~

~~(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.~~

The following is added to the cover page for the FESOP:

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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

#### **Comment #4**

##### B.4211 Annual Compliance Certification

This condition requires a submission of an annual compliance certification with the terms and conditions contained in the FESOP. The FESOP consists of forty-four pages and ninety-six conditions, but not all of them impose a compliance obligation on the Permittee (e.g. A.3, B.9, B.20). Therefore, this condition must be revised to specifically identify which of the ninety-six conditions in the FESOP are subject to the compliance certification requirement of Condition B.12.

#### **Response #4**

Pursuant to rule 326 IAC 2-8-5(a)(1), it's a Permittee's responsibility to identify which conditions in the permit are subject to compliance certification requirements. This is also explicitly stated under Condition B.12(c)(1) (now re-numbered B.11) "the appropriate identification of each term or condition of this permit that is the basis of the certification."

Furthermore, the Non-Rule Policy Revision Document (AIR 007 NPD; Guidelines for Submittal and Review of Annual Compliance Certification under the Federally Enforceable State Operating Permit (FESOP) and Part 70 Programs), which became effective in 2003, clearly states that "the source should review the permit terms and conditions carefully when completing the annual compliance certification to make sure the certification is accurate and address each relevant permit term and condition." Therefore in accordance with AIR 007 NPD, IDEM, OAQ has determined that it is the Permittee's responsibility to certify compliance with each permit condition.

There will be no changes to this condition in the final permit as a result of this comment.

#### **Comment #5**

- B.1.3 Preventative Maintenance Plan
- D.2.4 Preventative Maintenance Plan
- D.3.3 Preventative Maintenance Plan

Preventative maintenance plans are only required for emission control devices and are not required for facilities or emission units. Therefore, this condition should be revised to require preventative maintenance plans only for emission control devices.

## Response #5

Pursuant to 326 IAC 2-8-4(9), the Preventive Maintenance Plan requirement must be included in every applicable FESOP. 326 IAC 2-8-4(9) refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the boilers themselves because lack of proper maintenance on the boiler can result in boiler tube leaks or improper burner air settings which can result in increased emissions.

There are no changes made as a result of this comment, however, IDEM has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source. D.1.3, D.2.4 and D.3.3 have been removed from the permit, and (a) in Section B has been revised. Additionally, IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraphs (b) and (d) of Section B - Preventive Maintenance, and has amended the Section B - Emergency Provisions condition. The statement at the end of Emergency Provisions B.13(b)(4) has been removed, because this is stated again in (f). B.12 (c) (now re-numbered B.12(b)) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so a new (c) has been added to this condition.

### B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) ~~If required by specific condition(s) in Section D of this permit, t~~The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, ~~including the following information on each facility:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

The PMP extension notification does not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

- ~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~
- ~~(e)~~**(b)** A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation **is the primary contributor to an exceedance of any limitation on emissions or potential to emit.** The PMPs does not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

#### B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other

requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: ~~317-233-5674~~ **317-233-0178** (ask for Compliance Section)

Facsimile No.: ~~317-233-5967~~ **317-233-6865**

~~Failure to notify IDEM, OAQ by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the ~~authorized individual~~ as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.**

- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

**(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

- ~~D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]  
A Preventive Maintenance Plan, in accordance with Section B Preventive Maintenance Plan, of this permit, is required for this facility and its control device.~~
- ~~D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]  
A Preventive Maintenance Plan, in accordance with Section B Preventive Maintenance Plan, of this permit, is required for this facility and its control device.~~
- ~~D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]  
A Preventive Maintenance Plan, in accordance with Section B Preventive Maintenance Plan, of this permit, is required for this facility and its control device.~~

**Comment #6**

**B.1918 Operational Flexibility**

It is not clear that the Permittee may make changes under Section 502 (b)(10) of the Clean Air Act as that does not apply to FESOPs but only applies to Title V permits. Therefore, Condition B.19(b) should be deleted.

**Response #6**

In order to be consistent with 326 IAC 2-8-15(a)(5) the rule cite has been revised in B.18(a)(5) B.18 Operational Flexibility. (b) has been removed, because this is a Part 70 requirement, but not a FESOP requirement. A statement concerning backup fuel switches is being added to B.18 Operational Flexibility.

**B. ~~1918~~ Operational Flexibility [326 IAC 2-8-15] **[326 IAC 2-8-11.1]****

(a) (3) The changes do not result in emissions which exceed the ~~emissions allowable~~ **under limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-8-15(b) through (d). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, ~~to~~ for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(**2**), (c)(1), and (d).

~~(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:~~

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

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

~~(3) Any change in emissions; and~~

~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted by the Permittee does not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1.~~

**(eb) Emission Trades [326 IAC 2-8-15(c)]**

The Permittee may trade **emissions** increases and decreases ~~in emissions in at~~ the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

**(dc) Alternative Operating Scenarios [326 IAC 2-8-15(d)]**

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

**Comment #7**

**D.1.1 Particulate Matter Limit & D.1.2 Particulate Matter Less Than 10 Microns (PM-10)**

These two conditions establish limits for particulate matter emissions. First, D.1.1 establishes a 0.49 pounds per mmBtu limit for particulate matter. Condition D.1.2 establishes a limit of 6.0 pounds per hour for PM-10. In addition, D.1.2 limits the input of wood into the number one boiler to 8,086 tons per consecutive twelve-month period. It is not clear, and it is not explained in the technical support document the difference between the limits established in D.1.1 and D.1.2. Moreover, neither the draft permit nor the technical support document explains the basis for 8,086

ton per year wood input limit. IDEM needs to revise the permit, to clearly identify the relationship between the two limits and to clearly establish the basis for the wood input limitation. In addition, IDEM needs to identify the test method used to establish the limits in Condition D.1.1 and D.1.2. Compliance with these permit conditions can only be determined by using the same test method that was used to develop the permit limits.

## Response #7

Condition D.1.1 establishes a 0.49 pounds per mmBtu limit for particulate matter (PM) from Boiler 01 because Boiler 01 is subject to 326 IAC 6-2-2 for boilers constructed prior to September 21, 1983 and located in a county specified in 326 IAC 6-2-1(b). Boiler 01 was constructed in 1977 and the source is located in Johnson County, a specifically listed county, therefore, the PM emissions are limited by the equation from 326 IAC 6-2-2.

The source-wide uncontrolled potential to emit of PM-10 is greater than 100 tons per year, based on the maximum capacity of each emission unit and 8,760 hours of operation per year. Pursuant to 326 IAC 2-8-4 (FESOP), the source must limit PM-10 emissions to less than 100 tons per year, in order to render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The wood usage limit for the boilers in conjunction with the limit on the woodworking process ensures compliance with the PM-10 limitation of less than 100 tons per year. Based on a combined wood usage limit at Boiler 01 and Boiler 02 of 60,000 tons per twelve (12) consecutive month period (IDEM has decided to increase the wood usage limit from 8,086 to 60,000 tons per year to allow the source more flexibility by crediting the boilers particulate control devices), the limited PM-10 emissions will be 29.16 tons per year, and the total source-wide PM-10 emissions will be less than 100 tons per year as shown below:

Wood input limit \* Boiler PM-10 emission factor \* (1 - control efficiency) = PM-10 emissions

(60,000 tons of woodwaste/yr) \* (6.48 pounds of PM-10/ ton of woodwaste) \* (1/2000 lbs/ton) \* (1 - 0.85) = 29.16 tons of PM-10/year

Boilers PM-10 Emissions	= 29.16 tons/yr
Woodworking PM-10 Emissions	= 55.0 tons/yr
<u>Welding PM-10 Emissions</u>	<u>= 3.56 tons/yr</u>
Total source-wide PM-10	< 100 tons/yr

The reference methods for determining compliance with the limitations that apply to this facility are 40 CFR 60, Appendix A, Method 5 or 17 for PM emissions and 40 CFR 51, Appendix M, Method 201, 201A, and 202 for PM-10 emissions.

Condition D.1.2 has been revised to clarify that the wood usage limit is for both boilers combined. The pound per hour limit is now expressed in pounds per ton to reflect the maximum fuel usage limit. A fuel equivalence limit has been added for natural gas combustion (see ATSD Appendix A: page 1 of 1). The wood usage quarterly reporting form has been revised accordingly.

### D.1.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from **the 38 MMBtu per hour boiler and 60 MMBtu per hour boiler (Boiler 01 and Boiler 02)**, shall not exceed ~~6.0~~ **0.97** pounds per ~~ton hour, which is equivalent to 26.28 tons per year.~~ **ton hour.**
- (b) the input of wood in the **38 MMBtu per hour boiler and 60 MMBtu per hour boiler combined** shall be limited to less than ~~8,086~~ **60,000** tons per twelve (12) consecutive month period, **with compliance determined at the end of each month.**
- (c) **For purposes of determining compliance, every million cubic feet (MMCF) of natural gas burned shall be equivalent to 1.247 tons of wood fuel based on PM-10 emissions, such that the total tons of wood fuel, plus equivalent wood fuel input does not exceed the limit specified.**

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. The requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 (PSD) are also not applicable.

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

**FESOP Quarterly Report**

Source Name: David R. Webb Co., Inc.  
 Source Address: 205 South Holland Street, Edinburgh, Indiana 46124  
 Mailing Address: 206 South Holland Street, Edinburgh, Indiana 46124  
 FESOP No.: F081-12122-00014  
 Facility: Both boiler 01 and boiler 02  
 Parameter: PM-10  
 Limit: **The input of wood, plus equivalent wood equivalent in the 38 MMBtu per hour boiler (boiler 01) and 60 MMBtu per hour boiler (boiler 02) combined shall be limited to ~~8,086~~ 60,000 tons of wood per twelve (12) consecutive month period, with compliance determined at the end of each month.**  
**For purposes of determining compliance, every million cubic feet (MMCF) of natural gas burned shall be equivalent to 1.247 tons of wood fuel based on PM-10 emissions, such that the total tons of wood fuel, plus equivalent wood fuel equivalent input does not exceed the limit specified.**

YEAR:

Month	Column 1			Column 2	Column 1 + Column 2
	Amount of wood burned this month (tons)	Amount of natural gas burned this month (tons)	Total wood equivalent this month (tons)	Amount of wood and equivalent burned previous 11 months (tons)	Amount of wood and equivalent burned 12 month total (tons)
Month 1					
Month 2					
Month 3					

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

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

Attach a signed certification to complete this report.

## Comment #8

D.1.5 Visual Emission Notation

D.2.7 Visual Emission Notation

D.3.5 Visible Emission Notation

This condition requires an hourly visible emission reading by a trained employee to determine whether emissions are "normal" or "abnormal". Normality is based on conditions that would prevail eighty percent of the time. Since hourly visual emission were never required in the prior permit it is difficult to understand how Webb can comply with this condition when there is no basis to determine normality of emissions. Moreover there is no basis given for how the requirement relates to PM or PM-10 emissions. This condition does little if anything to advance environmental protection and should be dropped because it is unnecessary and a waste of time. Moreover this is a new condition that was not required in any prior permits. IDEM has not provided a basis for imposing conditions that were never imposed before nor has IDEM established why it is necessary that Indiana's FESOP permit must be, in essence, a Title V permit. Other states have issued EPA approved FESOPs that are significantly smaller, less burdensome, but still accomplishing the same task. IDEM's whole FESOP program appears to create additional work for IDEM staff without any apparent corresponding environmental benefit.

## Response #8

Compliance monitoring conditions such as the requirement to perform visible emission notations are necessary to demonstrate continuous compliance with the permit requirements. Visible emission notations are used to indicate compliance with 326 IAC 5-1 and the particulate matter limits pursuant to 326 IAC 6-2-3.

The requirement to have a trained employee work at the plant for at least one month is reasonable and appropriate. The characteristics of emissions from each facility are unique. What may appear to be normal emissions from one facility may not be normal for another facility.

Upon further review, IDEM has determined that once per day monitoring of the control device and visible emission notations is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the FESOP rules at 326 IAC 2-8-4 and 326 IAC 2-8-5.

The phrase ~~when venting to the atmosphere~~ in the parametric monitoring condition has been removed. It is not necessary for this to be in conditions for sources that will only be venting to the atmosphere.

IDEM has determined that Condition D.2.7 – Visible Emissions Notations for Boiler No. 02 is not necessary since the boiler is equipped with a continuous opacity monitor. Therefore, Condition D.2.7 – Visible Emissions Notations has been deleted.

D.1.54 Visible Emissions Notations

- (a) Visible emission notations of the No. 01 boiler stack exhaust shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

-----

- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports,~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

~~D.2.7~~ Visible Emissions Notations

- (a) ~~Visible emission notations of the No. 02 boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut-down time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

D.1.65 Parametric Monitoring

D.2.86 Parametric Monitoring

The Permittee shall record the ~~differential~~ pressure **drop** across the multiclone used in conjunction with the boiler, at least once per **shift day** when the boiler is in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the multiclone is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-~~Compliance Response Plan - Preparation, Implementation, Records, and Reports,~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C -~~Compliance Response Plan - Preparation, Implementation, Records, and Reports,~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other Instrument Specifications~~, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.97 Record Keeping Requirements [40 CFR 60.40c]

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per **shift day**.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain once per **shift day** records of the ~~differential~~ pressure **drop** during normal operation.

D.2.1411 Record Keeping Requirements [40 CFR 60.40c]

- (b) ~~To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the boiler stack S2 exhaust.~~
- (c) To document compliance with Condition **D.2.6** ~~D.2.8~~, the Permittee shall maintain once per ~~shift~~ **day** records of the ~~differential~~ pressure **drop** during normal operation when venting to the atmosphere.

**Comment #9**

D.1.7 Cyclone Inspection

D.2.9 Cyclone Inspection

This condition suggests that inspection of the cyclone must be made while they are in operation. It is not clear that this is what IDEM intended. This condition must be revised to clearly state that it will be inspected while not in operation.

**Response #9**

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections have been removed.

D.1.7 Cyclone Inspections

~~An inspection shall be performed each calendar quarter of all cyclones controlling boiler 01 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~

D.2.9 Cyclone Inspections

~~An inspection shall be performed each calendar quarter of all cyclones controlling boiler 02 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~

D.1.97 Record Keeping Requirements [40 CFR 60.40c]

- (d) ~~To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8 and the dates the vents are redirected.~~

D.2.1412 Record Keeping Requirements [40 CFR 60.40c]

- (d) ~~To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9.~~

## **Comment #10**

### D.1.86 Cyclone Failure Detection

### D.2.407 Cyclone Failure Detection

This condition requires the immediate shut down of the Weiss boiler if cyclone failure has been detected. This is unreasonable for several reasons. First, it is impossible to immediately shutdown the Weiss boiler because, if it is in operation, it is the only power source for the operation of the David R. Webb facility. Second, even if shutdown is required, it must be accomplished according to a procedure to safeguard the operation and equipment and to allow other processes that depend on the power supply to be stopped before the power is turned off. This condition needs to be revised to reflect how a facility such as the David R. Webb plant operates.

## **Response #10**

Pursuant to 326 IAC 2-8-4(1)(D), each FESOP is required to contain conditions which minimize excess emissions, to the extent feasible, caused by events such as a cyclone failure. The requirements shall take into consideration available technologies, safety cost, and other relevant factors. The OAQ does not consider shutting down the cyclone and associated production equipment to be infeasible in this case since the source operates a back-up boiler. Once a cyclone failure is observed, continuing to operate the equipment and venting uncontrolled particulate matter to the atmosphere may not be considered an attempt by the Permittee to take all reasonable steps to minimize levels of emissions that exceed an emission standard or other requirement in the permit. The source may continue operating only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Therefore, the OAQ believes that the requirement to shutdown the boiler and cyclone is a reasonable action to ensure compliance with the particulate matter limitations. There are no changes to this condition as a result of this comment.

## **Comment #11**

### D.1.9 Recordkeeping Requirements

This permit condition requires maintained records of the actual fuel usage since the "last compliance determination period" and an equivalent particulate matter emissions. It is not at all clear nor was it explained in the technical support document, what IDEM means by "last compliance determination period" or what is meant by the "equivalent particulate matter emissions". This condition needs to be revised to clarify what IDEM means by the phrase "last compliance determination matter period" and equivalent particulate matter emission.

## **Response #11**

The last compliance determination period is a sum of the last month's fuel usage and the previous 11 months' fuel usage, which is equivalent to the amount of fuel burned in the last 12 months.

The equivalent particulate matter emissions are the particulate emitted from the amount of fuel burned during the compliance determination period. However, this requirement is not necessary to show compliance with any conditions in the permit, therefore, it has been deleted.

Condition D.1.9 (re-numbered D.1.7) has been modified for clarification.

## **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### D.1.97 Record Keeping Requirements [40 CFR 60.40c]

- (a) **To document compliance with D.1.2,** The Permittee shall maintain records in accordance with (1) through (2) below:
- (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel usage since last compliance determination period ~~and equivalent particulate matter emissions;~~

### **Comment #12**

#### D.2.2 Particulate Matter (PM)

There appears to be several errors in this condition. First, it misstates the heat input limit for the number 2 boiler for combusting wood or for combusting natural gas. Second, based upon these incorrect values, it is not clear that the limits for particulate matter emissions for combusting wood and combusting natural gas are correct. Last, it is not clear how IDEM arrived at the higher limit on particulate matter when combusting natural gas than when combusting wood. IDEM needs to identify which test method was used to establish the limit set out in Condition D.2.2. Compliance with the limit can only be made using the same test methodology used to establish the limit.

### **Response #12**

Particulate emissions from indirect heating facilities constructed after September 21, 1983 are limited by the equation in 326 IAC 6-2-4. The rule requires the particulate emissions to be limited by total source maximum heat input capacity (Q). The total source maximum heat input capacity includes the capacity for the facility in question and the capacities for those facilities which were previously constructed or received prior permits to construct. As each new indirect heating facility is added to a plant the total source maximum heat input capacity increases. The total source maximum heat input capacity for Boiler 02 is equal to the sum of the heat input capacity of Boiler 01 and the heat input capacity of Boiler 02. As a result, the emission limitation for the newer unit (Boiler 02) is more stringent. Therefore, the heat input limit as stated in the permit is correct.

The limit on particulate matter when combusting natural gas is higher than when combusting wood because the total source maximum heat input capacity when combusting wood is greater than the total source maximum heat input capacity when combusting natural gas.

As stated in the response to comment #7, the reference methods for determining compliance with the limitations that apply to this facility are 40 CFR 60, Appendix A, Method 5 or 17 for PM emissions.

### **Comment #13**

#### D.2.3 Particulate Matter Less than 10 Microns

It is not clear what the basis is for limiting the wood input to the number one boiler to 8,086 tons per year. This condition needs to be justified or dropped from the permit.

### **Response #13**

See response to Comment #7.

## Comment #14

### D.2.13 Electrostatic (ESP) Failure Detection

This condition requires the immediate shut down of Boiler number 2 if an ESP failure has been detected. This is unreasonable for several reasons. First, it is impossible to immediately shutdown Boiler number 2 which if in operation is the only power source for the complete operation of the David R. Webb facility. Second, even if shutdown is required it must be shutdown according to a procedure to safeguard the operation and to allow other processes that depend on the power supply to be appropriately stopped before the power is turned off. This condition needs to be revised to reflect how a facility such as the David R. Webb plant operates.

## Response #14

Pursuant to 326 IAC 2-8-4(1)(D), each FESOP is required to contain conditions which minimize excess emissions, to the extent feasible, caused by events such as an electrostatic failure. The requirements shall take into consideration available technologies, safety cost, and other relevant factors. The OAQ does not consider shutting down Boiler #2 to be infeasible in this case since the source operates a back-up boiler. Once an electrostatic failure is observed, continuing to operate the equipment and venting uncontrolled particulate matter to the atmosphere may not be considered an attempt by the Permittee to take all reasonable steps to minimize levels of emissions that exceed an emission standard or other requirement in the permit. The source may continue operating only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Therefore, the OAQ believes that the requirement to shutdown the boiler is a reasonable action to ensure compliance with the particulate matter limitations. There are no changes to this condition as a result of this comment.

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.

The condition requiring electrostatic failure detection has been removed from the permit, since IDEM has determined that it is not required to ensure compliance with the permit.

IDEM has also determined that once per day monitoring of the electrostatic precipitator is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring the transformer rectifier (T-R) sets in service and the primary and secondary voltages and the currents of the T-R sets once per day is sufficient to satisfy the requirements of the FESOP rules at 326 IAC 2-8-4 and 326 IAC 2-8-5.

### D.2.149 Electrostatic Precipitator (ESP) Operating Condition Monitoring [326 IAC 2-8-5(a)(1)] [326 IAC 2-8-4]

---

~~That the electrostatic precipitator (ESP) shall be operated at all times when the boiler is in operation.~~

- ~~(a) The Permittee shall maintain, monitor and record the primary and secondary amperage and T-R set voltage of the ESP at a level which has been demonstrated by performance test, at least once per week. The Preventative Maintenance Plan for the ESP shall contain troubleshooting contingency and corrective actions for the ESP when the voltage of the T-R set drops five (5) direct current kilovolts or thirty (30) alternating volts below the predetermined baseline or if less than 90% of the total T-R sets are functioning.~~

~~(b) The instrument used for determining the T-R set voltage shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

**(a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit is in operation, by measuring and recording the number of transformer rectifier (T-R) sets in service and the primary and secondary voltages and the currents of the T-R sets.**

**(b) Reasonable response steps shall be taken in accordance with Section C - Response to Excursions or Exceedances whenever the percentage of T-R sets in service falls below ninety percent (90%). T-R set failure resulting in less than ninety percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C -Response to Excursions or Exceedances, shall be considered a deviation from this permit.**

~~D.2.12 Electrostatic (ESP) Inspections~~

~~An inspection shall be performed each calendar quarter of the ESP. A record shall be kept of the results of the inspection and the number of ESP part(s) replaced.~~

~~D.2.13 Electrostatic (ESP) Failure Detection~~

~~In the event that the ESP failure has been observed:~~

~~(a) The affected process will be shut down immediately until the failed unit has been repaired or replaced.~~

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

D.2.149 Record Keeping Requirements [40 CFR 60.40c]

~~(e)~~**(d)** To document compliance with Condition **D.2.8** ~~D.2.14~~, the Permittee shall maintain **weekly once per day** records of the primary and secondary amperage and T-R set voltage of the ESP at a level which has been demonstrated by performance test.

**Comment # 15**

D.2.1412 Recordkeeping

It is unclear why actual fuel usage must be recorded and what is meant by "last compliance determination" and "equivalent particular matter emissions". The condition needs to be revised.

**Response #15**

Recordkeeping and reporting of the actual fuel usage is required in order to assure compliance with the PM-10 limitation of less than 100 tons per year required in order to maintain a FESOP status. Condition D.2.15(b) has been added to the permit to indicate that reporting is required for D.2.3(b). The last compliance determination period is a sum of the last month fuel usage and the previous 11 months fuel usage, which gives the amount of fuel burned in the last 12 months.

The equivalent particulate matter emissions is the particulate emitted from the amount of fuel burned during the compliance determination period. However, this requirement is not necessary to show compliance with any conditions in the permit, therefore, it has been deleted.

D.2.149 Record Keeping Requirements [40 CFR 60.40c]

**(a)** To document compliance with D.2.3, the Permittee shall maintain records in accordance

with (1) through (2) below:

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel usage since last compliance determination period and equivalent particulate matter emissions;

#### D.2.4510 Reporting Requirements

- (b) A quarterly summary of the information to document compliance with Condition D.2.3(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).**

#### **Comment #16**

##### D.3.2 Particulate Matter Less than 10 Microns

It is unclear where IDEM obtained the 12.56 pounds per hour limit for PM10 emissions. There is no documentation that particulate matter less than 10 microns are produced in any significant quantity by the woodworking operation. IDEM needs to identify what test method was used to set the 12.56 pounds per hour limit. Compliance with the limit can only be determined by using the same test methodology that was used to develop the limit.

#### **Response #16**

The PM-10 emission limitation for the woodworking operation in Section D.3.2 is required to show compliance with 326 IAC 2-8-4 (FESOP). The source-wide uncontrolled potential to emit of PM-10 is greater than 100 tons per year. Pursuant to 326 IAC 2-8-4 (FESOP), the source must limit PM-10 emissions to less than 100 tons per year, in order to render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by limiting PM-10 emissions to less than 100 tons per year. The PM10 allowable limit of 12.56 pounds per hour (55.0 tons per year) for the woodworking process in conjunction with the limited PM-10 emissions from the two (2) boilers of 29.16 tons per year ensures compliance with the source-wide PM-10 limitation of less than 100 tons per year (see response to comment #7 for details).

As stated in the response to comment #7, the reference methods for determining compliance with the limitations that apply to this facility are 40 CFR 60, Appendix A, Method 5 or 17 for PM emissions and 40 CFR 51, Appendix M, Method 201, 201A, and 202 for PM-10 emissions.

#### TECHNICAL SUPPORT DOCUMENT FOR FESOP

#### **Comment #17**

##### Page 3 of 15 Unrestricted Potential to Emit

The technical support document states "Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit." There is no basis provided for this statement, nor do we believe it to be legally correct. New source performance standards as well as SIP requirements are federally enforceable whether or not they are in a permit. Therefore, there is no basis for this statement that requirements are not federally enforceable unless they are in a federally enforceable permit. These requirements could be in an MSOP and be federally enforceable. Furthermore, the three cyclones and baghouse that are a part of the woodworking operation are not air pollution control equipment but are rather part of the veneer production process. This equipment is part of the "physical and operational design" of the veneer operation and therefore limits the potential to emit. Since the woodworking collection is clearly a part of the process and not air pollution control equipment, as described earlier, Webb's potential to emit both

PM and PM-10 is less than 100 TPY and not "greater than 250" as depicted in the table on page 4.

### Response #17

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit (PTE) is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency." If the control equipment is not considered an integral part of the process, then the PTE is determined without the consideration of the use of the controls and that PTE is used to determine the permitting level. Once the FESOP is issued the use of the controls are enforceable to limit them below the Part 70 thresholds (326 IAC 2-8-4(1)). All terms and conditions in a FESOP, including any provisions designed to limit a source's potential to emit, are enforceable by the U.S. EPA and citizens under the CAA (326 IAC 2-8-6(b)).

IDEM, OAQ has determined that the baghouse does not serve as a necessary component of the woodworking process and was added to the source for the primary purpose of controlling air pollutant emissions. Therefore, the baghouse is not considered as an integral part of the woodworking process.

### Comment #18

#### Appendix A: Emission Calculations

We are unable to determine how IDEM arrived at the emission factors in pounds per ton of wood burned set forth in Appendix A. EPA published emission factors set out in AP-42 are completely different than those used in determining Webb's PTE on pages 2 and 3 of Appendix A. IDEM needs to explain how the factors were arrived at in order for us to be able to comment on whether they were correctly calculated.

### Response #18

The emission factors used in the calculations are from AP 42, Chapter 1.6, Tables 1.6-1, 1.6-2, 1.6-3, 1.6-7 and from data provided by the source in the permit application.

Upon further review, the OAQ has decided to make the following changes to the FESOP. Bolded language has been added and the language with a line through it has been deleted.

1. The signature blocks, P.O. box and the zip code on the cover page of the permit along with Commissioner and Governor's name have been revised to reflect the latest model update.

### Table of Contents

2. The following updates have been made to the table of contents in order to be complete, clear, and correct.  
B.8 Duty to Supplement and Provide Information ~~[[326 IAC 2-8-3(f)]]~~ [326 IAC 2-8-4(5)(E)]  
~~[[326 IAC 2-8-5(a)(4)]]~~  
B.1516 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
**[[326 IAC 2-8-4(5)(C)]]****[[326 IAC 2-8-7(a)]]****[[326 IAC 2-8-8]]**  
B.1819 Operational Flexibility [326 IAC 2-8-15]**[[326 IAC 2-8-11.1]]**  
B.2021 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**[[IC 13-30-3-1]]****[[IC 13-17-3.2]]**  
B.2422 Transfer of Ownership or Operational Control [326 IAC 2-8-10]  
B.2223 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**[[326 IAC 2-1.1-7]]**  
B.24 Credible Evidence **[[326 IAC 2-8-4(3)]]****[[326 IAC 2-8-5]]****[[62 FR 8314]]** [326 IAC 1-1-6]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) ~~p~~**P**ounds per ~~h~~**H**our [326 IAC 6-3-2]

~~C.1514 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]~~  
~~[326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]~~

~~C.4615 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.245]~~

~~C.4716 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]~~

~~C.4817 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]~~  
~~[326 IAC 2-8-5]~~

3. IDEM has decided that the name of the authorized individual is no longer required in Section A.1 (General Information) of the permit. Section A.1 has been revised to delete the name of the authorized individual. A general source phone number has been added to the permit. A ~~County Status@~~ has been deleted; it was not removed previously when replaced by ~~@Source Location Status@~~ in order to clarify when only portions of a county are non-attainment.

Changes Resulting from Ozone 8-hour County Attainment Status Designations and the implementation of PM2.5:

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Johnson County has been designated as basic nonattainment for the 8-hour ozone standard.

Also, the U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Johnson County as nonattainment for PM2.5. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.

The following has been corrected to state that Johnson County has been designated as basic nonattainment for Ozone and nonattainment for PM2.5:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary veneer manufacturing plant.

Authorized individual:	<del>Bill Costoplos, Vice President - Operations</del>
Source Address:	205 South Holland Street, Edinburgh, Indiana, 46124
Mailing Address:	206 South Holland Street, Edinburgh, Indiana, 46124
<b>General Source Phone:</b>	<b>812/526-2601</b>
SIC Code:	2435
Source Location Status:	Johnson
<del>County Status:</del>	<del>Attainment for all criteria pollutants</del>
Source Status:	<b>Nonattainment for PM2.5</b> <b>Basic nonattainment for Ozone under the 8-hour standard</b> <b>Attainment for all other criteria pollutants</b> Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act <b>Minor Source, under Emission Offset</b>

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged.

### County Attainment Status

The source is located in Johnson County.

Pollutant	Status
<b>PM2.5</b>	<b>nonattainment</b>
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
<b>8-hour Ozone</b> Ozone	<b>basic nonattainment attainment</b>
CO	attainment
Lead	attainment

- ~~(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as attainment or unclassifiable for ozone.~~
- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Johnson County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Johnson County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

### State Rule Applicability - Entire Source

#### 326 IAC 2-1.1-5 (Nonattainment NSR)

Johnson County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major

**source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. David R. Webb Co., Inc. has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 (Nonattainment NSR) does not apply**

4. The descriptive information section A.2 has been revised to include the continuous opacity monitor for Boiler 02.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (b) One (1) wood-fired boiler with a natural gas back-up burner, identified as Boiler 02, constructed in January of 1993, with maximum heat input capacities of 60 MMBtu per hour when burning wood and 22.6 MMBtu per hour when burning natural gas, using a multicclone separator in line with an electrostatic precipitator as control, **equipped with a continuous opacity monitor**, and exhausting to stack S2; and
5. Condition A.5 (Prior Permits Superseded) has also been removed from the A section and has been added to the Section B instead. All the subsequent Section B conditions have been re-numbered.

A.5B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits **established prior to F081-12122-00014 and** issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**Section B**

6. Condition B.1 (Permit No Defense) has also been removed from the B section and has been added to the FESOP title page instead. All the subsequent Section B conditions have been re-numbered.

B.1 ~~Permit No Defense [IC 13]~~

~~Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.~~

The following is added to the cover page for the FESOP:

**Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.**

7. Conditions B.3 (now re-numbered B.2) has been revised and a new Condition B.3 has been added to the permit to further address and clarify the permit term and the term of the conditions. All other Section B conditions have been re-numbered accordingly.

In order to avoid confusion for renewals as to what ~~an original~~ date IDEM is referring to, the following change has been made:

**B.32 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]**

- (a) This permit, **F081-12122-00014**, is issued for a fixed term of five (5) years from the ~~original~~ **issuance date of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) **If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.**

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

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

- (a) **the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**
- (b) **the emission unit to which the condition pertains permanently ceases operation.**
8. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from B.8 Duty to Supplement and Provide Information. Remember to update TOC. Since B.8 (c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b), (now (a)) was revised to remove the statement about confidential information, and (c) was updated for clarity. Also, the condition was revised to change a rule reference. Subpart (c) (now (b)) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:

**B.8 Duty to Supplement and Provide Information ~~[326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]~~**

- ~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

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

~~The submittal by the Permittee does require the certification by the ~~an authorized individual~~ as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b)(a)~~ **The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the ~~an authorized individual~~ as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.~~ [326 IAC 2-8-4(5)(E)]**
- ~~(c)(b)~~ **For information furnished by the Permittee to IDEM, OAQ, ~~t~~The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies**

of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

9. A statement was added to B.10 Certification in order to clarify that the certification form may cover more than one document that is submitted.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

10. Condition B.14(c) has been removed from B.14 Deviations from Permit Requirements and Conditions, then revised and incorporated in B.13 Emergency Provisions.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- ~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

11. Conditions B.16 (now re-numbered B.17) has been revised for clarification.

~~B.16~~ B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~

~~(1) — A timely renewal application is one that is:~~

~~(A)(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(B)(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~(2) — If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.~~

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-8-9]~~

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

12. B.17 Permit Amendment or Revision has been revised to replace ~~should~~ with ~~shall~~ in (b).

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

by Any such application ~~should~~ **shall** be certified by the ~~authorized individual~~ as defined 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

13. B.17 has been revised to replace ~~Permit Revision~~ with ~~Source Modification~~.

B.20 ~~Permit Revision~~ **Source Modification** Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

14. For clarity, additional rule cites have been added to B.20 Inspection and Entry.

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-13.2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

15. B.21 (c) Transfer of Ownership or Operational Control rule cite has been corrected.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-44 **10(b)(3)**]

16. 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-8; therefore, this rule cite is being added to B.22. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

**B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

17. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

**B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

**Section C**

18. The following change has been made to C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

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

~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

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

**Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.**

19. IDEM has decided that it is best to have the "Operation of Equipment" requirement under compliance determination in the specific D conditions. Therefore, C.7 has been removed.

~~C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]~~

~~Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

20. C.9(e) (re-numbered C.8(e)) Asbestos Abatement Projects has been revised to correct the rule cite.

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-41, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation

**The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).**

(f)(g) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provision of 40 CFR 61, Subpart M, is federally enforceable.~~

21. The following was added to C.11 (re-numbered C.10) Compliance Requirements to state what OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements:

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

22. Condition C.13 (now re-numbered C.12) "Maintenance of Continuous Emission Monitoring Equipment" has been replaced with the correct condition for the maintenance of continuous opacity monitor.

~~C.13 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

- ~~(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~
- ~~(b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~
- ~~(c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.~~
- ~~(d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 12 and 40 CFR 60.43c, Subpart Dc.~~

**C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COMS shall be in operation at all times that the induced draft fan is in operation.**
- (b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.**
- (c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.**
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.**
  - (1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.**
  - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.**
  - (3) Method 9 readings may be discontinued once a COMS is online.**
  - (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.**
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, (and 40 CFR 60 and/or 40 CFR 63).**

23. IDEM realizes that these specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

~~C.1514 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]~~

---

- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%") of full scale reading.**
- (b) ~~The Permittee may request that the IDEM, OAQ approve the use of a pressure gauge or other~~ **an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other the parameters.**

24. C.16 (re-numbered C.15) Risk Management Plan has been revised for clarity. The condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

~~C.1615 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]~~

~~If a regulated substance, subject to as defined in 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:~~  
**Permittee must comply with the applicable requirements of 40 CFR 68.**

- (a) ~~A compliance schedule for meeting the requirements of 40 CFR 68; or~~
- (b) ~~As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).~~

~~All documents submitted pursuant to this condition shall include the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).~~

25. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

~~C.1716 Compliance Response Plan Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]~~

---

- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
  
- ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
  
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
  - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
  - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~
  - ~~(4) Failure to take reasonable response steps shall constitute a violation of the permit.~~~~
  
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:
  - ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
  - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
  - ~~(3) An automatic measurement was taken when the process was not operating.~~
  - ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~~~
  
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

- ~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
- (1) monitoring results;**
  - (2) review of operation and maintenance procedures and records;**
  - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
- (1) monitoring data;**
  - (2) monitor performance data, if applicable; and**
  - (3) corrective actions taken.**

26. In order to clarify which documents need to be certified by an authorized individual, the following update has been made:

**C.4817** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

- 
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a**

description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the ~~A~~authorized individual~~@~~ as defined by 326 IAC 2-1.1-1(1).

27. It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made:

C.4918 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
28. C.20 (d) (re-numbered C.19(d)) General Reporting Requirements has been revised to indicate all forms instead of the choice between quarterly or semi-annual.
- (d) Unless otherwise specified in this permit, ~~any quarterly~~ **all reports** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The report do~~ **All reports do** require the certification by the ~~A~~authorized individual~~@~~ as defined by 326 IAC 2-1.1-1(1).
29. Clarification has been added to (e) of C.20 (re-numbered C.19(e)) General Reporting Requirements to define what calendar year means.
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, **unless otherwise specified in this permit. For the purpose of this permit a calendar year@ means the twelve (12) month period from January 1 to December 31 inclusive.**

**Section D**

30. Previously, the terms ~~A~~particulate~~@~~ and ~~A~~particulate matter~~@~~ were both used in the 326 IAC 6-2, but revisions were made to the rule which became effective on June 12, 2002 that included using the term ~~A~~particulate~~@~~ is used consistently in 326 IAC 6-2.

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

Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 38 MMBtu per hour heat input boiler shall be limited to 0.49 pounds per MMBtu heat input.

D.1.4 Particulate Matter (PM) and PM-10 Control

In order to comply with Conditions D.1.1 and D.1.2, the multicclone for ~~PM and PM-10~~ **particulate**

control shall be in operation and control emissions from the boiler at all times when Boiler 01 is in operation.

31. Conditions D.2.1 and D.2.2 have been revised as follows:

D.2.1 Particulate Matter (PM) [40 CFR 60.40c]

Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The PM emissions from the sixty (60) MMBtu per hour wood-fueled boiler shall not exceed one tenth (0.1) pound per million Btu heat input; ~~or~~ **and**
- (b) Opacity shall not exceed twenty percent (20%) in any one (1) six (6) minute averaging period, except for one six (6) minute period per hour of not more than twenty-seven percent (27%) opacity.

D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the No. 02 boiler shall be limited to 0.33 pounds per MMBtu heat input when combusting wood and limited to 0.37 pounds per MMBtu heat input when combusting natural gas.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input  
Q = total source max. indirect heater input = 98 MMBtu/hr when combusting wood and 60.6 MMBtu/hr when combusting natural gas

32. Condition D.2.3 has been revised to clarify that the wood usage limit is for both boilers combined. The pound per hour limit is now expressed in pounds per ton to reflect the maximum wood usage limit. A fuel equivalence limit has been added for natural gas combustion (see ATSD Appendix A: page 1 of 1).

D.2.3 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from **the 38 MMBtu per hour boiler and 60 MMBtu per hour boiler (Boiler 01 and Boiler 02)**, shall not exceed **6.0 0.97** pounds per **ton** hour, ~~which is equivalent to 26.28 tons per year.~~
- (b) the input of wood in the **38 MMBtu per hour boiler and 60 MMBtu per hour boiler combined** shall be limited to less than ~~8,086~~ **60,000** tons per twelve (12) consecutive month period, **with compliance determined at the end of each month, so that PM-10 emissions are limited below 100 tons per year.**
- (c) **For purposes of determining compliance, every million cubic feet (MMCF) of natural gas burned shall be equivalent to 1.247 tons of wood fuel based on PM-10 emissions, such that the total tons of wood fuel, plus equivalent wood fuel equivalent input does not exceed the limit specified.**

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. The requirements of 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21 (PSD)~~ are also not

applicable.

33. Condition D.2.5 states that testing is required to show compliance with D.2.1, D.2.2 and D.2.3, therefore PM-10 testing has been added to the condition.

D.2.54 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) To demonstrate compliance with Conditions D.2.1, D.2.2 and D.2.3, PM **and PM-10** testing in accordance with 40 CFR 60.45c, Subpart Dc, is required for wood burning to show compliance with 40 CFR 60.40c, Subpart Dc, 326 IAC 6-2-2 and 326 IAC 2-8.
34. Particulate matter emissions monitoring is required for Boiler 02 per NSPS Subpart Dc, therefore the rule cite [40 CFR 60.40c] has been added as shown below:

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] [40 CFR 60.40c]**

35. Recordkeeping is required for Boiler 02 per NSPS Subpart Dc, therefore, a new D.2.14(g) has been added to the permit.

D.2.14 Record Keeping Requirements [40 CFR 60.40c]

- (g) **To document compliance with Condition D.2.1, the Permittee shall perform record keeping and reporting as required by Subpart Dc, including performance test data, performance evaluation of the CEMS, excess emission reports, and the daily amount of fuel combusted during every six month reporting period.**
- (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
36. Previously, the terms ~~particulate~~ and ~~particulate matter~~ were both used in the 326 IAC 6-3, but revisions were made to the rule which became effective on June 12, 2002 that included using the term ~~particulate~~ is used consistently in 326 IAC 6-3.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (**Particulate Emission Limitations for Manufacturing Processes Process Operations**), the allowable **PM particulate** emission rate from the woodworking facilities shall not exceed 21.67 pounds per hour when operating at a process weight rate of 12 tons per hour.

37. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition ~~D.3.4~~ **D.3.3** requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

D.3.43 Particulate Matter (PM and PM-10) Control

- (a) In order to comply with D.3.1 and D.3.2, the three (3) cyclones and one (1) baghouse for PM and PM-10 control shall be in operation and control emissions from the woodworking processes at all times that the woodworking processes are in operation.
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

38. Condition D.3.5 (now re-numbered D.3.4) has been revised to reflect Condition C.16.

#### D.3.54 Visible Emissions Notations

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If~~ **abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

39. Paragraph (b) of this condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

#### D.3.76 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

**(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has**

**been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

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

40. Condition D.3.9 (now re-numbered D.3.8) has been revised to reflect Condition C.16.

**D.3.98 Cyclone Failure Detection**

In the event that cyclone failure has been observed:

Failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation~~ **violation of deviation from** this permit.

41. The first box on the Emergency Occurrence Report form was revised to include the word ~~A~~working@ in order to be consistent with 326 IAC 2-8-12(b)(5) and the Emergency Provision.

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)

- X The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- X The Permittee must submit notice in writing or by facsimile within two **(2) working** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

42. The third sentence on the Quarterly Deviation and Compliance Monitoring report form has been replaced with the sentence that is consistent with the condition in Section B Deviations from Permit Requirements and Conditions.

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

43. Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test) (now re-numbered C.16) had two errors in the spelling of one hundred twenty (120) days. There should be no "dash" and no "and".

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in ~~one hundred and twenty~~ **one hundred twenty** (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

44. IDEM has decided to delete the phrase "when exhausting to the atmosphere and". This phrase is not needed for units that always vent outdoors. Therefore, Condition D.1.4 has been revised as follows:

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the No. 01 boiler stack exhaust shall be performed once per day during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

45. Conditions D.1.7, D.2.9 and D.3.9 have been revised for clarification.

D.1.7 Record Keeping Requirements

- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per day. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain once per day records of the pressure drop during normal operation. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**

D.2.9 Record Keeping Requirements [40 CFR 60.40c]

- (b) To document compliance with Condition ~~D.2.7~~ **D.2.6**, the Permittee shall maintain once per day records of the pressure drop during normal operation. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain weekly records of the primary and secondary amperage and T-R set voltage of the ESP at a level which has been demonstrated by performance test. **The Permittee shall include in its weekly record when the primary and secondary amperage and T-R set voltage readings are not taken and the reason for the lack of the primary and secondary amperage and T-R set voltage readings (e.g. the process did not operate that week).**

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- (b) To document compliance with Conditions D.3.5 and D.3.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.3.5 and D.3.7, and the dates the vents are redirected. **The Permittee shall include in its quarterly record when an inspection is not performed and the reason for the lack of an inspection (e.g. the process did not operate that quarter).**

46. The permit has been revised to include the mailing codes for each respective IDEM, OAQ department. Mailing code MC 61-50 has been added for Technical Support and Modeling addresses. Mailing code MC 61-52 has been added for Asbestos Section address. Mailing code MC 61-53 has been added for Permits Branch, Compliance Branch, Compliance Data Section addresses and to the cover page of the permit.

On April 9, 2007 and August 21, 2007, Guinn P. Doyle, Barnes and Thornburg, LLP submitted comments on behalf of David R. Webb Co., Inc. on the proposed FESOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

#### Comment #1

Condition A.2 -- Emission Units and Pollution Control Equipment Summary.

The draft FESOP limits wood waste burned to 60,000 tons per year. The wood waste burned is generated by the woodworking operation. If the woodworking operation does not generate enough wood waste to supply the plant's needs, additional wood wastes is obtained from off-site sources. There is no direct correlation between the maximum capacity of the woodworking system and the amount of wood waste generated. Therefore, Webb suggests that the 36,000 board feet per day maximum capacity be deleted from Condition A.2(c) and the Facility Description box in Section D.3.

#### Response #1

IDEM, OAQ believes that the description of the maximum throughput of facilities is important for regulatory purposes since the maximum capacity (process weight rate) is used to establish the 326 IAC 6-3-2 particulate matter emission limitation. There are no changes to the permit as a result of this comment.

#### Comment #2

Condition A.3 -- Insignificant Activities.

First, it is not clear how IDEM identified Stacks S10 and S11 that the permit indicates exhausts to the parts cleaning operations. Webb requests further explanation. Second, Webb has five (5) veneer dryers, not six (6) as stated. Third, in Condition A.3.(b) the designation of the operations appears to use "05" twice. Finally, the list of "Other categories with emissions below in significant thresholds" should be revised as follows:

- (A) Three (3) MIG welders
- (B) Six (6) stick welders
- (C) One (1) TIG welder
- (D) Five (5) oxyacetylene flame-cutting operations
- (E) One (1) Plasma cutter.

#### Response #2

The stacks (Stacks S10 and S11) were identified based on the information provided by David R. Webb at the time of the application. Based on the comments, Section A.3 was revised as follows:

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [~~326 IAC 2-8-3(c)(3)(I)~~]

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

- (a) A parts cleaning operation, identified as 05, with a maximum capacity of 35 gallons per year, and exhausting to stacks ~~S10, and S11~~ **23 and 24**;
- (b) ~~Six (6)~~ **Five (5)** veneer dryers, each emitting less than 2.5 tons per year of a combination of HAPs, identified as ~~04 through 09~~ **dryer 1 through dryer 5**, and exhausting to **the**

**following stacks: ~~S4—S9~~;**

- (1) dryer 1 is exhausting to stacks 1 through 6.**
- (2) dryer 2 is exhausting to stacks 7 through 10.**
- (3) dryer 3 is exhausting to stacks 11 through 15.**
- (4) dryer 4 is exhausting to stacks 16 through 19.**
- (5) dryer 5 is exhausting to stacks 20 through 22.**

(c) Other categories with emissions below insignificant thresholds:

- (1) Welding operations with PM-10 emission less than twenty-five (25) pounds per day:
  - (A) **Three (3) ~~One (1)~~** metal inert gas (MIG) welders.
  - (B) **Six (6) ~~Two (2)~~** stick welders.
  - (C) **One (1) ~~Two (2)~~** tungsten inert gas (TIG) welders.
  - (D) **Five (5) ~~One (1)~~** oxyacetylene flame-cutting operations.
  - (E) One (1) plasma cutter.

### Comment #3

Condition C.8 -- Asbestos Abatement Projects

Rather than setting out all of the requirements for an asbestos abatement project, Webb suggests that IDEM just require Webb to comply with the applicable asbestos regulations whenever an asbestos abatement project is undertaken at the Edinburgh plant.

### Response #3

The shorter version of the asbestos abatement requirements language has been included to replace the previously longer version language as follows:

~~C.8 — Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

- ~~(a) — Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~
- ~~(b) — The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - ~~(1) — When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~
  - ~~(2) — If there is a change in the following:
    - ~~(A) — Asbestos removal or demolition start date;~~
    - ~~(B) — Removal or demolition contractor; or~~~~~~

~~(C) — Waste disposal site.~~

- ~~(c) — The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~(d) — The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2254

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

**The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.**

**Comment #4**

Condition D.1.5 -- Parametric Monitoring

Condition D.2.6 -- Parametric Monitoring

Webb is not sure how IDEM determined the normal operating range for pressure drop across the multicclone. Secondly, when a stack test is conducted, a range of pressure drops is not developed because the unit operates under constant conditions which would not give a pressure drop range. Webb will provide information to IDEM on the appropriate pressure drop range for the multicclone separator. Third, it is not clear from the way Condition D.1.5 is worded whether Webb has to comply with the 3.0 to 6.0 inches of water limit or whether the limit changes after each stack test. This needs to be clarified. Finally, IDEM, OAQ approves instruments that do not meet the specifications in C.14(a). There is no basis for IDEM approval of instruments that meet the specifications in Condition C.14(a).

**Response #4**

David R. Webb did not provide IDEM with the manufacturer's specifications on the pressure drop range for the multicclone as part of the permit application. Therefore, a default range was chosen by IDEM within which most multicclones are likely to operate. The source is required to comply with the 3.0 to 6.0 inches of water limit until a range is established during the latest stack test approved by IDEM.

Pursuant to 326 IAC 2-8-4(3), each FESOP shall contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements. The FESOP shall incorporate all applicable record keeping requirements, including, the analytical techniques or methods used. Therefore, IDEM has the authority to approve instruments that meet the specifications in Condition C.14(a).

#### **Comment #5**

##### **Condition D.2.4 -- Testing Requirements**

Webb interprets Condition D.2.4(a) to mean that when Webb conducts testing to demonstrate compliance with Conditions D.2.1, D.2.2 and D.2.3, that PM and PM-10 testing must be done in accordance with 40 CFR 60.45c, Subpart Dc. This condition does not impose a specific date to conduct PM and PM-10 testing. Secondly, Webb does not understand the basis for the requirement that Webb must conduct testing to demonstrate that CO emissions are less than or equal to 57.4 tons per year. The 60,000 tons per year wood waste limit will keep CO emissions to less than 100 ton per year.

#### **Response #5**

Pursuant to 40 CFR 60.45c, Subpart Dc, the source is required to conduct performance testing according to the timeframe required under §60.8, and to conduct subsequent performance tests as requested by the Administrator. There are no changes to the permit as a result of this comment.

The source opted to use another source of CO emission factor for wood fired boilers, instead of the IDEM approved emission factor to calculate CO emissions. Therefore, testing must be performed to demonstrate that the source is able to comply with the FESOP requirements based on the proposed emission factor. There are no changes to the permit as a result of this comment.

#### **Comment #6**

##### **Condition D.2.9 -- Record Keeping Requirements**

Because boiler 02 is equipped with a continuous opacity monitor, it is not clear why Webb has to maintain weekly records of primary and secondary amperage and the T-R set voltage of the electrostatic precipitator (ESP). Secondly, it is not clear that Webb is required by 40 CFR 60.40c to record amperages and voltage during performance testing and therefore why IDEM is requiring recording of these amperages and voltage. Third, in D.2.9(d), the permit requires recording the amount of fuel combusted daily during every six-month reporting period. However, the reporting forms provided with the revised FESOP require quarterly reporting. It is not clear whether IDEM is requiring semi-annual or quarterly reporting of fuel combusted daily.

#### **Response #6**

David R. Webb is required, pursuant to 40 CFR 60.40c to operate continuous opacity monitors (COM) to measure opacity from the boiler. Pursuant to 40 CFR 60.40c, 326 IAC 6-2-4 and 326 IAC 2-8-4, the source is required to operate the ESP to control particulate emissions from the boiler to be in compliance with these rules. The particulate matter emission limits and the opacity limits were established separately for different requirements. Compliance with the opacity limit does not always indicate compliance with other applicable particulate matter emissions limits. In addition, IDEM believes that proper amperages and voltage are required for ESP to operate properly. There are no changes to the permit as a result of this comment.

The source is required to report monthly combined fuel usage for Boilers 01 and 02 on a quarterly basis to demonstrate compliance with 326 IAC 2-8-4 (FESOP) requirements. The daily fuel usage report for Boiler 02 is required on a semi-annual basis to demonstrate compliance with 40 CFR 60.40c, Subpart Dc requirements. Both semi-annual and quarterly reports are required to meet the permit conditions. There are no changes to the permit as a result of this comment.

### **Comment #7**

#### Condition D.3.2 -- Particulate Matter Less than Ten Microns

It is not clear how IDEM calculated the emissions limit for woodworking as 55.0 tons per year. Information provided in Appendix A to the ATSD indicates that controlled emissions from the woodworking are 18.45 tons per year. Webb requests further explanation on how the 55 tons per year PM-10 limit for woodworking was arrived at.

### **Response #7**

The 55 tons per year PM-10 limit for woodworking is an arbitrary limit established by IDEM to ensure compliance with the source-wide PM-10 limitation of less than 100 tons per year while allowing the source greater operational flexibility. (see response to comment #7 on page 10 of 46 for details)

### **Comment #8**

#### Condition D.3.3 -- Particulate Control

Webb suggests that reference to the three cyclones be removed from Condition D.3.3 because the three cyclones are not emission control units but are a part of the wood waste fuel collection system.

#### Condition D.3.4 -- Visible Emissions Notation

As indicated above, the three cyclones are not air pollution control devices. Moreover, they do not exhaust to a stack but through the baghouse stack. Webb suggests that the word "cyclones" be removed from Condition D.3.4.

#### Condition D.3.7 and Condition D.3.8 -- Cyclone Inspections and Cyclone Failure Detection

Both these conditions refer to the cyclones which are not air pollution control devices. Because the cyclones are not control devices, there is no basis to require that they be inspected. Webb suggests that D.3.7 and D.3.8 be removed.

### **Response #8**

IDEM agrees that the three cyclones are integral to the woodworking process and the permitting level was determined using the potential to emit after the three (3) cyclones (see Appendix A of the ATSD: page 2 of 2). Since the level of the permit was determined based on the emissions after the three (3) cyclones, the operating conditions in the permit must specify that the cyclones shall operate at all times when the woodworking process is in operation. Therefore, there is no change to the condition and the Permittee shall continue to operate the cyclones as required in the permit.

The cyclones must operate properly in order for the woodworking process to achieve compliance with the applicable PM emission limits; therefore, IDEM believes it is reasonable and necessary to require the source to keep records of compliance and to take appropriate response steps, as specified in Conditions D.3.4, D.3.7 and B.3.8. There has been no change to the permit as a result of these comments.

### **Comment #9**

#### Section D.4 -- Degreasing Operations

Section D.4 addresses degreasing operations but all of the requirements apply to open-top vapor degreaser operations. Webb does not operate an open-top vapor degreaser. Webb's degreaser is a parts washer. Therefore, Section D should either be removed or revised to reflect the type of degreasing operation Webb conducts.

## Response #9

Conditions D.4.1 and D.4.2 have been revised to remove the 326 IAC 8-3 language for open top vapor degreaser operations and to add the language for cold cleaner degreaser operations.

### D.4.1 Volatile Organic Compounds (VOC)

~~Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreaser Operations), the owner or operator shall:~~

- ~~(a) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;~~
- ~~(b) Keep the cover closed at all times except when processing work loads through the degreaser;~~
- ~~(c) Minimize solvent carryout by
  - ~~(1) Racking parts to allow complete drainage;~~
  - ~~(2) Moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);~~
  - ~~(3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;~~
  - ~~(4) Tipping out any pools of solvent on the cleaned parts before removal; and~~
  - ~~(5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;~~~~
- ~~(d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;~~
- ~~(e) Not occupy more than half of the degreaser's open top area with the workload;~~
- ~~(f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;~~
- ~~(g) Never spray above the vapor level;~~
- ~~(h) Repair solvent leaks immediately, or shut down the degreaser;~~
- ~~(i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;~~
- ~~(j) Not use workplace fans near the degreaser opening;~~
- ~~(k) Not allow visually detectable water in the solvent exiting the water separator; and~~
- ~~(l) Provide a permanent, conspicuous label summarizing the operating requirements.~~

### D.4.2 Volatile Organic Compounds (VOC)

- ~~(a) Pursuant to 326 IAC 8-3-6(a) (Open Top Vapor Degreaser Operation and Control), the owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:~~

- ~~(1) Equip the degreaser with a cover than can be opened and closed easily without disturbing the vapor zone.~~
  - ~~(2) Equip the degreaser with the following switches:
    - ~~(A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.~~
    - ~~(B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).~~
    - ~~(C) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
    - ~~(D) Equip the degreaser with one (1) of the following control devices:
      - ~~(i) A freeboard ratio of seventy five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight tenths (10.8) square feet).~~
      - ~~(ii) A refrigerated chiller.~~
      - ~~(iii) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.~~
      - ~~(iv) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.~~
      - ~~(v) Other systems of demonstrated equivalent or better control as those outlined in clauses (i) through (iv). Such systems shall be submitted to the U.S. EPA as a SIP revision.~~~~~~
- ~~(b) Pursuant to 326 IAC 8-3-6(b) (Open Top Vapor Degreaser Operation and Control Requirements), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:
  - ~~(1) Keep the cover closed at all times except when processing workloads through the degreaser.~~
  - ~~(2) Minimize solvent carryout emissions by:
    - ~~(A) Racking articles to allow complete drainage;~~
    - ~~(B) Moving articles in and out of the degreaser at less than three and three tenths (3.3) meters per minute (eleven (11) feet per minute);~~
    - ~~(C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;~~
    - ~~(D) Tipping out any pools of solvent on the cleaned articles before removal; and~~
    - ~~(E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.~~~~
  - ~~(3) Prohibit the entrance into the degreaser of porous or absorbent materials such as,~~~~

~~but not limited to, cloth, leather, wood, or rope.~~

- ~~(4) Prohibit occupation of more than one-half (2) of the degreaser's open top area with the workload.~~
- ~~(5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.~~
- ~~(6) Prohibit solvent spraying above the vapor level.~~
- ~~(7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.~~
- ~~(8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~
- ~~(9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.~~
- ~~(10) Prohibit the use of workplace fans near the degreaser opening.~~
- ~~(11) Prohibit visually detectable water in the solvent exiting the water separator.~~

#### **D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

---

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:**

- (a) Equip the cleaner with a cover;**
- (b) Equip the cleaner with a facility for draining cleaned parts;**
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;**
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;**
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

#### **D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]**

---

**(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:**

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:**
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));**
  - (B) The solvent is agitated; or**

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**ATSD Appendix A: Emission Calculations**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 South Holland Street Edinburgh, IN 46124  
**FESOP:** 081-12122  
**Plt ID:** 081-00014  
**Reviewer:** Alic Bent/EVP

**Fuel Usage Limitations for Boilers 01 and 02 Combined**

tons wood-burned/year

60,000
--------

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO*
Emission Factor in lb/tons wood burned	8.8	6.48	0.1	1.5	0.2	3.0
Controlled/Limited Emission in tons/yr	39.60	29.16	2.25	45.00	6.60	90.00

Methodology:

MMBtu = 1,000,000 Btu

potential wood burned (tons/hr) = (3.8 x 10E7 Btu/hr) x (1 lb/6180 Btu) x 1 ton/2000 lb

Emission Factors from AP 42, Chapter 1.6, Tables 1.6-1, 1.6-2, 1.6-3, 1.6-7

Emission (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton wood burned) x 8,760hrs/yr x 1 ton/2000 lb \* (1-control efficiency)

Worst case particulate control efficiency is 85%

\* CO emissions factor based on source stack test

**Fuel equivalence limit for natural gas based on PM10 emissions from woodwaste**

$$\begin{aligned}
 & \frac{0.80 \text{ n.g. potential emissions (ton/yr)}}{198.00 \text{ n.g. potential usage (MMCF/yr)}} \quad / \quad \frac{225.04 \text{ wood potential emissions (ton/yr)}}{69456.00 \text{ wood potential usage (ton/yr)}} \\
 & = \quad 1.2470 \frac{\text{tons wood burned}}{\text{MMCF n.g. burned}}
 \end{aligned}$$

**PM-10 Emission Limit:**

$$\begin{aligned}
 29.16 \text{ tons PM-10/yr} & = \quad 6.66 \text{ lb/hr, based on 8,760 hr/yr} \\
 & \quad 0.97 \text{ lb PM10/ton wood, based on 60,000 tons wood /yr}
 \end{aligned}$$

**Appendix A: Process Particulate Emissions**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 South Holland Street Edinburgh, IN 46124  
**FESOP:** 081-12122  
**Pit ID:** 081-00014  
**Reviewer:** Alic Bent/EVP

<b>Uncontrolled Emissions (tons/year)</b>						
<b>A. Baghouses</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
03	1	0.01000	9.4	5,227	99.95%	36,892.46
<b>Controlled Emissions (tons/year)</b>						
<b>A. Baghouses</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
03	1	0.01000	9.4	5,227	99.95%	18.45
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:						<b>18.45</b>

**Methodology:****Potential (uncontrolled):**

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

**Potential (controlled):**

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable State  
Operating Permit (FESOP)**

**Source Background and Description**

**Source Name:** David R. Webb Co., Inc.  
**Source Location:** 205 South Holland Street, Edinburgh, Indiana 46124  
**County:** Johnson  
**SIC Code:** 2435  
**Operation Permit No.:** F081-12122-00014  
**Permit Reviewer:** Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from David R. Webb Co., Inc. relating to the operation of a veneer manufacturing facility.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) wood-fired boiler, identified as Boiler 01, constructed in 1977, with a maximum heat input capacity of 38 MMBtu per hour, using a multiclone separator as control, exhausting to stack S1, and used only as a back-up boiler or when Boiler 02 is firing natural gas;
- (b) One (1) wood-fired boiler with a natural gas back-up burner, identified as Boiler 02, constructed in January of 1993, with maximum heat input capacities of 60 MMBtu per hour when burning wood and 22.6 MMBtu per hour when burning natural gas, using a multiclone separator in line with an electrostatic precipitator as control, and exhausting to stack S2; and
- (c) A woodworking operation consisting of hogging, debarking, and sawing, identified as 03, with a maximum capacity of 36,000 board feet (bdft) per day, using three (3) cyclones and (1) baghouse as control, and exhausting to stack S3.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Insignificant Activities**

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

- (a) A parts cleaning operation, identified as 05, with a maximum capacity of 35 gallons per year, and exhausting to stacks S10, and S11;

- (b) Six (6) veneer dryers, each emitting less than 2.5 tons per year of a combination of HAPs, identified as 04 through 09, and exhausting to stacks S4-S9 and;
- (c) Other categories with emissions below insignificant thresholds:
  - (1) Welding operations with PM-10 emissions less than twenty-five (25) pounds per day:
    - (A) One (1) metal inert gas (MIG) welder.
    - (B) Two (2) stick welders.
    - (C) Two (2) tungsten inert gas (TIG) welders.
    - (D) One (1) oxyacetylene flame-cutting operations.
    - (E) One (1) plasma cutter.

### Existing Approvals

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

- (a) CP 081-2582-00014, issued on November 25, 1992;
- (b) Permit 41-05-91-0089, issued on February 1, 1988;
- (c) Permit 41-05-91-0090, issued on February 1, 1988; and
- (d) Registration 081-3458, issued on February 22, 1994.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) CP 081-2582-00014, issued November 25, 1992

Condition 4: That wood waste fuel for the No. 2 boiler shall be limited to 65, 843 tons annually, based on a twelve month average rolled on a monthly basis. During the first 12 months of operation, wood fuel usage shall be limited such that, total fuel consumed divided by months of operation shall not exceed 5,487 tons per month. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Reason not incorporated: Condition 4 in CP081-2582-00014 was included to make sure PM emissions from Boiler 02 are limited to less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 do not apply. The proposed FESOP shall include conditions which will limit the source-wide PM emissions, including Boiler 02's emissions, to less than 100 tons per year. Therefore Condition 4 in CP081-2582-00014 is no longer required.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	Weiss boiler	70	3.5	10,300	550
S2	Volcano boiler	80	3.5	38,000	548
S3	fuel storage bin	56	18.5	22,600	ambient
S4-9	veneer dryer vents	23			
S10,11	parts cleaner tanks	55 gallon drum base			

### Enforcement Issue

- (a) IDEM is aware that the source was not issued a FESOP by December 14, 1996 nor did they submit a Part 70 application by that date.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

### Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on April 5, 2000. Additional information was received on August 24, 2000.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 10.)

### Unrestricted Potential Emissions

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls for the worst case scenario (combusting wood in Boiler 02, and not operating Boiler 01). Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	less than 100
CO	less than 100
NO <sub>x</sub>	less than 100

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

HAP's	Unrestricted Potential Emissions (tons/yr)
acetaldehyde	less than 10
formaldehyde	less than 10
hexane	less than 10
methanol	less than 10
MIBK	less than 10
Manganese	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter (PM-10) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

No previous emission data has been received from the source.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
combustion	26.28 <sup>(1)</sup>	26.28 <sup>(1)</sup>	1.59	4.68	57.38	31.89	0.19
woodworking	55.0 <sup>(2)</sup>	55.0 <sup>(2)</sup>	-	-	-	-	-
degreaser	-	-	-	0.12	-	-	-
welding	3.56	3.56	-	-	-	-	0.05
dryers	-	-	-	10.79	-	-	10.79
<b>Total Emissions</b>	<b>84.84</b>	<b>84.84</b>	<b>1.59</b>	<b>15.59</b>	<b>57.38</b>	<b>31.89</b>	<b>11.03</b>

(1) Limitations due to NSPS Subpart Dc.

(2) PTE to comply with 326 IAC 2-8 (FESOP).

**County Attainment Status**

The source is located in Johnson County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as attainment or unclassifiable for ozone.

**Federal Rule Applicability**

- (a) The parts cleaning operation is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63, Subpart T) because it does not use halogenated solvents.
- (b) The boilers at this source are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) for Small Industrial-Commercial-Institutional Steam Generating Units. This rule applies to steam generating units for which construction, modification or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu per hour or less, but greater than or equal to 10 MMBtu per hour.

The 38 MMBtu per hour boiler, identified as Boiler 01, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because it was constructed prior to June 9, 1989.

The 60 MMBtu per hour boiler, identified as Boiler 02, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). This rule requires the following:

- (1) Particulate matter emissions be limited to 0.10 pounds per MMBtu of heat input. The boiler is in compliance with this limitation based on supporting calculations;

$60 \text{ MMBtu per hour} * 0.10 \text{ pounds per MMBtu} = 6.0 \text{ pounds of particulate matter allowed per hour} = 26.28 \text{ tons per year}$

Particulate matter emissions is controlled to 5.61 tons per year which is less than the allowed 26.28 tons per year, therefore the boiler is in compliance.

The multiclone and the electrostatic precipitator must be in operation at all times Boiler 02 is in operation in order to comply with this limit.

- (2) opacity be limited to 20 percent as a 6-minute average, except for one 6-minute period per hour limited to 27 percent opacity, and except for start-up, shut-down and malfunction periods;
- (3) initial compliance testing for particulate matter and opacity;
- (4) Particulate matter emissions monitoring; and
- (5) record keeping and reporting as required by Subpart Dc, including performance test data, performance evaluation of the CEMS, excess emission reports, and the daily amount of fuel combusted during every six month reporting period.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration)**

This source was constructed in 1977, before the applicability date of August 7, 1980, and is not one of the 28 listed source categories. Since August 7, 1980, the source installed a new boiler (Boiler 02). However, the source is not considered a major source because PM and PM-10 emissions are controlled to less than 250 tons per year (tpy) and 100 tpy, respectively. The limits pursuant to 326 IAC 6-2 for boiler 01 and boiler 02, the limit pursuant to Subpart Dc for boiler 02 and the limit pursuant to 326 IAC 6-3-2 for woodworking ensure that 326 IAC 2-2 does not apply. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) are not applicable.

##### **326 IAC 2-4.1-1 (New Source Toxics Control)**

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because the source has PTE of any HAP less than 10 tons per year and PTE of any combination of HAPs less than 25 tons per year. Therefore, 326 IAC 2-4.1-1 does not apply.

##### **326 IAC 2-6 (Emission Reporting)**

This source is located in Johnson County which is not one of the specifically listed counties, nor does this FESOP source have the potential to emit CO, VOC, NO<sub>x</sub>, PM10 (including fugitive emissions), or SO<sub>2</sub> in amounts at or exceeding one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-6 still do not apply to the source.

326 IAC 2-8-4 (FESOP)

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from both boiler 01 and boiler 02, shall each not exceed 6.0 pounds per hour, which is equivalent to 26.28 tons per year.
- (b) the input of wood in the 38 MMBtu per hour boiler shall be limited to less than 8,086 tons per twelve (12) consecutive month period.
- (c) the PM-10 emissions from the woodworking operation, shall not exceed 12.56 pounds per hour, which is equivalent to 55.0 tons per year.

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. The requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) are also not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) The No. 01 wood fired boiler, rated at 38 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, the boiler is limited by the following equation from 326 IAC 6-2-2 because it is located in Johnson County and was constructed prior to September 21, 1983:

$$Pt = \frac{0.87}{Q^{0.16}}$$

where: Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)  
Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

$$Pt = 0.87 / (38)^{0.16}$$
$$Pt = 0.49 \text{ lb/MMBtu}$$

Therefore the No. 01 boiler will be limited to particulate emissions of 0.49 lb/MMBtu heat input.

Compliance calculation:

$0.49 \text{ lbs/MMBtu} * (38 \text{ MMBtu/hr}) * 8760 \text{ hrs/yr} * 1/2000 \text{ lbs/ton} = 81.56 \text{ tons/year PM allowed}$

The controlled PM emissions (17.78 tons/year) for Boiler 01 are less than the allowed emissions (81.56 tons/year), therefore the boiler is in compliance with this rule.

The multiclone must be in operation at all times the No. 01 boiler is in operation to comply with this limit.

**326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

The No. 02 boiler, rated at 60 MMBtu per hour when combusting wood, and 22.6 MMBtu/hr when combusting natural gas, is subject to the particulate matter limitations of 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, the boiler is limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input

Q = total source max. indirect heater input = 98 MMBtu/hr for wood combustion and 60.6 MMBtu/hr for natural gas combustion

Wood combustion:

$$Pt = 1.09/(98)^{0.26}$$

Pt = 0.33 pounds per MMBtu

Natural gas combustion:

$$Pt = 1.09/(60.6)^{0.26}$$

Pt = 0.37 pounds per MMBtu

Compliance calculation:

Wood combustion:

$(0.33 \text{ lb/MMBtu}) * (60 \text{ MMBtu/hr}) * (8,760 \text{ hrs/yr}) * (1/2,000 \text{ lbs/ton}) = 86.72 \text{ tons/year}$

Natural gas combustion:

$(0.37 \text{ lb/MMBtu}) * (22.6 \text{ MMBtu/hr}) * (8,760 \text{ hrs/yr}) * (1/2,000 \text{ lbs/ton}) = 36.62 \text{ tons/year}$

Controlled PM emissions when combusting wood (5.61 tons per year) are less than allowable PM emissions (86.72 tons/year), therefore the boiler will comply with the requirements of 326 IAC 6-4.

Potential PM emissions when combusting natural gas (0.20 tons per year) are less than allowable PM emissions (36.62 tons/year), therefore the boiler will comply with the requirements of 326 IAC 6-4.

The multiclone and the electrostatic precipitator must be in operation at all times the No. 02 boiler is in operation and combusting wood to comply with this limit.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the woodworking operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$
$$P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (12)^{0.67}$$

$$E = 21.67 \text{ lb/hr}$$

The three (3) cyclones and the baghouse shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

326 IAC 8-3-3 (Open Top Vapor Degreaser Operation)

The parts cleaner is subject to 326 IAC 8-3-3. This rule applies to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state. Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreaser Operation), the owner or operator shall:

- (a) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing work loads through the degreaser;
- (c) Minimize solvent carryout by
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (4) Tipping out any pools of solvent on the cleaned parts before removal; and
  - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;

- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

**326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements)**

The parts cleaner is subject to 326 IAC 8-3-6 because it was constructed after July 1, 1990, and is an open top vapor degreaser with an air to solvent interface of one (1) square meter (ten and eight-tenths (10.8) square feet) or greater, and is located in Johnson County.

- (a) Pursuant to 326 IAC 8-3-6(a) (Open Top Vapor Degreaser Operation and Control Requirements), the owner or operator of an open top vapor degreaser emissions unit shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover than can be opened and closed easily without disturbing the vapor zone.
  - (2) Equip the degreaser with the following switches:
    - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
    - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
    - (C) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
    - (D) Equip the degreaser with one (1) of the following control devices:
      - (i) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
      - (ii) A refrigerated chiller.
      - (iii) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
      - (iv) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
      - (v) Other systems of demonstrated equivalent or better control as those outlined in clauses (i) through (iv). Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-6(b) (Open Top Vapor Degreaser Operation and Control Requirements), the owner or operator of an open top vapor degreaser shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when processing workloads through the degreaser.
  - (2) Minimize solvent carryout emissions by:
    - (A) Racking articles to allow complete drainage;
    - (B) Moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
    - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
    - (D) Tipping out any pools of solvent on the cleaned articles before removal; and
    - (E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
  - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
  - (4) Prohibit occupation of more than one-half ( $\frac{1}{2}$ ) of the degreaser's open top area with the workload.
  - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
  - (6) Prohibit solvent spraying above the vapor level.
  - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
  - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
  - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
  - (10) Prohibit the use of workplace fans near the degreaser opening.
  - (11) Prohibit visually detectable water in the solvent exiting the water separator.

#### Testing Requirements

- (a) Testing for wood burning by Boiler 02 is required to demonstrate compliance with the requirements of NSPS 40 CFR 60.40c, Subpart Dc and 326 IAC 6-2-4.

- (b) Using AP-42 emission factors for wood combustion, the potential emissions of CO from the two (2) boilers would be greater than 250 tons per year. The source has submitted alternative emission factors based on previous stack tests for CO emissions. Testing is required within 180 days of issuance of this permit for Boiler 2 to verify stack test data used in determining potential emissions of carbon monoxide.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The woodworking operation has applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emission notations of the woodworking operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
  - (c) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

These monitoring conditions are necessary because the baghouse for the woodworking process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

2. The 38 MMBtu per hour boiler, identified as Boiler 01, has applicable compliance monitoring conditions as specified below:
  - (a) Once per shift visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (b) The Permittee shall record the differential pressure across the multiclone used in conjunction with the boiler, at least once per shift when the boiler is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the multiclone is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (c) An inspection shall be performed each calendar quarter of all cyclones controlling the boiler when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
  - (d) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the multiclone for Boiler 01 must operate properly to ensure compliance with 326 IAC 6-2-2 (Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

3. The 60 MMBtu per hour boiler, identified as Boiler 02, has applicable compliance monitoring conditions as specified below:
- (a) Once per shift visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (b) The Permittee shall record the differential pressure across the multiclone used in conjunction with the boiler, at least once per shift when the boiler is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the multiclone is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (c) An inspection shall be performed each calendar quarter of all cyclones controlling the boiler when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
  - (d) In the event that cyclone failure has been observed:  
  
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (e) The Permittee shall maintain, monitor and record the primary and secondary amperage and T-R set voltage of the ESP at a level which has been demonstrated by performance test, at least once per week. The Preventative Maintenance Plan for the ESP shall contain troubleshooting contingency and corrective actions for the ESP when the voltage of the T-R set drops five (5) direct current kilovolts or thirty (30) alternating volts below the predetermined baseline or if less than 90% of the total T-R sets are functioning. The instrument used for determining the T-R set voltage shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. An inspection shall be performed each calendar quarter of the ESP. A record shall be kept of the results of the inspection and the number of ESP part(s) replaced.

These monitoring conditions are necessary because the multiclone and the electrostatic precipitator for Boiler 02 must operate properly to ensure compliance with New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

### **Conclusion**

The operation of this veneer manufacturing facility shall be subject to the conditions of the attached proposed FESOP No.: F081-12122-00014.

## Appendix A: Emission Calculations

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 South Holland Street Edinburgh, IN 46124  
**FESOP:** 081-12122  
**Plt ID:** 081-00014  
**Reviewer:** Alic Bent/EVP

<b>Uncontrolled Potential Emissions (tons/year)</b>								
Emissions Generating Activity								
Pollutant	Wood (Boiler 01) Combustion	Wood (Boiler 02) Combustion	Natural Gas (Boiler 02) Combustion	Woodworking Baghouse	Degreaser	Dryers (6)	Welding	<b>TOTAL</b>
PM	118.50	187.11	0.20	184,462.32	0.00	0.00	3.56	184,771.49
PM10	87.26	137.78	0.80	184,462.32	0.00	0.00	3.56	184,690.92
SO <sub>2</sub>	1.01	1.59	0.10	0.00	0.00	0.00	0.00	2.60
NO <sub>x</sub>	20.20	31.89	9.90	0.00	0.00	0.00	0.00	52.09
VOC	2.96	4.68	0.50	0.00	0.12	10.79	0.00	18.55
CO	40.40	57.38	8.30	0.00	0.00	0.00	0.00	48.70
total HAPs	0.00	0.00	0.19	0.00	0.00	10.79	0.05	11.03
worst case single HAP	0.00	0.00	0.18	0.00	0.00	5.12	5.12	5.12
Total emissions based on rated capacity at 8,760 hours/year.								

<b>Controlled Potential Emissions (tons/year)</b>								
Emissions Generating Activity								
Pollutant	Wood (Boiler 01) Combustion	Wood (Boiler 02) Combustion	Natural Gas (Boiler 02) Combustion	Woodworking Baghouse	Degreaser	Dryers (6)	Welding	<b>TOTAL</b>
PM	17.78	5.61	0.01	18.45	0.00	0.00	3.56	45.39
PM10	13.09	4.13	0.02	18.45	0.00	0.00	3.56	39.23
SO <sub>2</sub>	1.01	1.59	0.10	0.00	0.00	0.00	0.00	2.60
NO <sub>x</sub>	20.20	31.89	9.90	0.00	0.00	0.00	0.00	52.09
VOC	2.96	4.68	0.50	0.00	0.12	10.79	0.00	18.55
CO	40.40	57.38	8.30	0.00	0.00	0.00	0.00	97.78
total HAPs	0.00	0.00	0.19	0.00	0.00	10.79	0.05	11.03
worst case single HAP	0.00	0.00	0.18	0.00	0.00	5.12	5.12	5.12
Total emissions based on rated capacity at 8,760 hours/year, after control.								

**Appendix A: Emission Calculations  
Wood Fired Boilers  
Boiler 01**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 S. Holland Street Edinburgh, IN 46124  
**FESOP:** 081-12122  
**Plt ID:** 081-00014  
**Reviewer:** Alic Bent/EVP  
**Date:** April 17, 2002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
tons wood-burned/hour

38.0

3.074

Heat Input Capacity includes:  
one (1) wood-fired (walking grate) boiler rated at 38 MMBtu/hr

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO*
Emission Factor in lb/tons wood burned	8.8	6.5	0.1	1.5	0.2	3.0
Potential Emission in tons/yr	118.50	87.26	1.01	20.20	2.96	40.40

Methodology:

MMBtu = 1,000,000 Btu

potential wood burned (tons/hr) = (3.8 x 10E7 Btu/hr) x (1 lb/6180 Btu) x 1 ton/2000 lb

Emission Factors from AP 42, Chapter 1.6, Tables 1.6-1, 1.6-2, 1.6-3, 1.6-7

Emission (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton wood burned) x 8,760hrs/yr x 1 ton/2000 lb

\* CO emissions factor based on source stack test

**Appendix A: Emission Calculations  
Wood Fired Boilers  
Boiler 02**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 S. Holland Street Edinburgh, IN 46124  
**FESOP:** 081-12122  
**Plt ID:** 081-00014  
**Reviewer:** Alic Bent/EVP  
**Date:** April 17, 2002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
tons wood-burned/hour

60.0

4.854

Heat Input Capacity includes:  
one (1) wood-fired (walking grate) boiler rated at 60.0 MMBtu/hr

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/tons wood burned	8.8	6.5	0.1	1.5	0.2	*
Potential Emission in tons/yr	187.11	137.78	1.59	31.89	4.68	57.38
Potential Emission in tons/yr	5.61	4.13	1.59	31.89	4.68	57.38

Methodology:

MMBtu = 1,000,000 Btu

potential wood burned (tons/hr) = (6.0 x 10E7 Btu/hr) x (1 lb/6180 Btu) x 1 ton/2000 lb

Emission Factors from AP 42, Chapter 1.6, Tables 1.6-1, 1.6-2, 1.6-3, 1.6-7

Emission (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton wood burned) x 8760 hrs/yr x 1 ton/2000 lb

\* CO emissions based on stack test performed at the source in 1994

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 S. Holland Street Edinburgh, Indiana 46124  
**FESOP:** 081-12122  
**Plt ID:** 081-00014  
**Reviewer:** Alic Bent/EVP  
**Date:** April 17, 2002

Heat Input Capacity                      Potential Throughput  
 MMBtu/hr                                      MMCF/yr

22.6	198.0
------	-------

Natural Gas Combustion at Boiler 02

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.8	0.1	9.9	0.5	8.3

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Small Industrial Boiler**  
**HAPs Emissions**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 S. Holland Street Edinburgh, Indiana 46124  
**FESOP:** 081-12122  
**Plt ID:** 081-00014  
**Reviewer:** Alic Bent/EVP  
**Date:** April 17, 2002

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.079E-04	1.188E-04	7.424E-03	1.782E-01	3.366E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.949E-05	1.089E-04	1.386E-04	3.762E-05	2.079E-04

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Process Particulate Emissions**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 South Holland Street Edinburgh, IN 46124  
**FESOP:** 081-12122  
**Pit ID:** 081-00014  
**Reviewer:** Alic Bent/EVP

<b>Uncontrolled Emissions (tons/year)</b>						
<b>A. Baghouses</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
03	1	0.01000	9.4	5,227	99.95%	36,892.46
<b>Controlled Emissions (tons/year)</b>						
<b>A. Baghouses</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
03	1	0.01000	9.4	5,227	99.95%	18.45
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:						<b>18.45</b>

**Methodology:**State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs

Company Name: David R. Webb Co., Inc.  
 Address City IN Zip: 206 S. Holland Street Edinburgh, IN 46124  
 Permit No./Plt ID: 081-12122-00014  
 Reviewer: Alic Bent/EVP  
 Date: April 17, 2002

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)	1	3		0.0055	0.0005			0.017	0.002	0.000	0.000	0.002
Stick (E7018 electrode)	2	4.275		0.0211	0.0009			0.180	0.008	0.000	0.000	0.008
Tungsten Inert Gas (TIG)(carbon steel)	2	3		0.0055	0.0005			0.033	0.003	0.000	0.000	0.003
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	1.5	20	0.1622	0.0005	0.0001	0.0003	0.292	0.000	0.000	0.000	0.000
Plasma	1	1.5	20	0.1622	0.0005	0.0001	0.0003	0.292	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>								<b>PM = PM10</b>	<b>Mn</b>	<b>Ni</b>	<b>Cr</b>	<b>Total HAPS</b>
Potential Emissions lbs/hr								0.81	0.01	0.00	0.00	0.01
Potential Emissions lbs/day								19.53	0.30	0.00	0.00	0.30
Potential Emissions tons/year								<b>3.56</b>	0.05	0.00	0.00	0.05

METHODOLGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emission Calculations  
Veneer Dryers**

**Company Name:** David R. Webb  
**Plant Location:** 206 S. Holland St. Edinburgh, Indiana 46124  
**County:** Johnson  
**Date Received:** April 22, 2002  
**Permit Reviewer:** Alic Bent/EVP

**\*\* emissions before controls \*\***

Acetaldehyde (H)	2.5E-03 lb/MSF	550000 MSF/yr	2000 lb/ton	0.69 tons/yr	Source Stack Test
Acrolein (H)	ND lb/MSF	550000 MSF/yr	2000 lb/ton	0.00 tons/yr	Source Stack Test
Formaldehyde (H)	2.8E-04 lb/MSF	550000 MSF/yr	2000 lb/ton	0.08 tons/yr	Source Stack Test
Methanol (H)	3.1E-03 lb/MSF	550000 MSF/yr	2000 lb/ton	0.85 tons/yr	Source Stack Test
MIBK (H)	6.6E-04 lb/MSF	550000 MSF/yr	2000 lb/ton	0.18 tons/yr	Source Stack Test
<hr/>					
Total emissions before controls:				1.80 tons/yr	<b>per dryer</b>

ND = none detected

**\*\* total emissions before controls \*\***

Acetaldehyde (H)	0.69 tons/yr	6 dryers	=	4.13 tons/yr
Acrolein (H)	0.00 tons/yr	6 dryers	=	0.00 tons/yr
Formaldehyde (H)	0.08 tons/yr	6 dryers	=	0.46 tons/yr
Methanol (H)	0.85 tons/yr	6 dryers	=	5.12 tons/yr
MIBK (H)	0.18 tons/yr	6 dryers	=	1.09 tons/yr
<hr/>				
Total emissions before controls:				10.79 tons/yr

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Degreasing Operations**

**Company Name:** David R. Webb Co., Inc.  
**Address City IN Zip:** 206 South Holland Street Edinburgh, IN 46124  
**FESOP:** 081-12122  
**Pit ID:** 081-00014  
**Reviewer:** Alic Bent/EVP  
**Date:** April 17, 2002

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
ZEP DYNA 143	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00400	1.000	6.58	6.58	0.03	0.63	0.12	0.00

**State Potential Emissions**

**0.03                      0.63                      0.12                      0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)