



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

April 8, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Frank Miller Lumber Compnay, Inc / 135-15494-00029

FROM: Paul Dubenetzky  
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 9/16/03



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

**Frank Miller Lumber Company, Inc.  
1690 Frank Miller Road  
Union City, Indiana 47390**

(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. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F 135-15494-00029	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 8, 2004  Expiration Date: April 8, 2009

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## 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)]

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The Permittee owns and operates a stationary lumber mill.

Authorized individual:	Vice-President of Operations
Source Address:	1690 Frank Miller Road, Union City, Indiana 47390
Mailing Address:	1690 Frank Miller Road, Union City, Indiana 47390
General Source Phone Number:	765 - 964 - 3196
SIC Code:	2421
County Location:	Randolph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; 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)]

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

- (a) One (1) wood waste-fired boiler, known as Lambion, exhausting at one (1) stack, identified as Stack 1, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 1983, rated at a maximum of 5.02 million British thermal units per hour.
- (b) One (1) wood waste-fired boiler, known as Hurst, exhausting at one (1) stack, identified as Stack 2, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 1987, rated at a maximum of 13.4375 million British thermal units per hour.
- (c) One (1) woodworking area equipped with nine (9) generic woodworking machines using water mist dust controls, constructed in 1993 with a maximum capacity of 3,000 board feet or 12.0 tons of wood per hour, total.
- (d) One (1) wood waste-fired boiler, known as Hurst 2, exhausting at one (1) stack, identified as Stack 3, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 2004, rated at 20.1 million British thermal units per hour (600 horsepower).

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 13.432 million British thermal units per hour consisting of:
  - (1) Two (2) aerovent make-up units, rated at 6.50 million British thermal units per hour each.

- (2) One (1) Luxaire oil furnace converted to natural gas, rated at 0.182 million British thermal units per hour.
- (3) One (1) Reznor furnace, rated at 0.250 million British thermal units per hour.
- (b) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (d) Other emergency equipment as follows: Stationary electric fire pumps.
- (e) One (1) sawdust storage bin, capacity: 136 tons of sawdust and 1 ton of sawdust per hour (326 IAC 6-3-2).

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) to renew a Federally Enforceable State Operating Permit (FESOP).

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

- (a) All terms and conditions of previous permits 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 GENERAL CONDITIONS

### 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.

### B.2 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.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit 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.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.
- (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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

- (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 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).

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, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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.
  - (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
  - (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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 (ask for Compliance Section)  
Facsimile No.: 317-233-5967
  - (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

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) 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) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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.15 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.16 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, IN 46206-6015

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

- (1) A timely renewal application is one that is:

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

(B) 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.

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

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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 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 emissions allowable under 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes 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 increases and decreases in emissions in 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.

B.19 Permit Revision 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.20 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]

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.21 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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.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]

(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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units and control equipment in Section A.2.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

**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 [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.
- (b) 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.
  - (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) 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 that the source's potential to emit does not exceed the above specified limits.
- (c) 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 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.

**C.8 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.9 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.10 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

**C.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.

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

**C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and recordkeeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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.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.

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

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.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 Compliance Response Plan - Preparation, Implementation, Records, and Reports [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 time frame 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from 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, in accordance with Section D, 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.

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 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 "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 recordkeeping 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 Permittee 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 "authorized individual" as defined by 326 IAC 2-1.1-1(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 Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

**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)]: Lambion & Hurst Wood Waste Boilers**

- (a) One (1) wood waste-fired boiler, known as Lambion, exhausting at one (1) stack, identified as Stack 1, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 1983, rated at a maximum of 5.02 million British thermal units per hour.
- (b) One (1) wood waste-fired boiler, known as Hurst, exhausting at one (1) stack, identified as Stack 2, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 1987, rated at a maximum of 13.4375 million British thermal units per hour.

(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 6-2-4]**

- (a) Pursuant to 326 IAC 6-2-4(a) (Emission limitations for facilities specified in 326 IAC 6-2-1(d)) the particulate emissions from the 5.02 million British thermal units per hour heat input Lambion boiler shall not exceed 0.60 pounds per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-4(a) (Emission limitations for facilities specified in 326 IAC 6-2-1(d)) the particulate emissions from the 13.4375 million British thermal units per hour heat input Hurst boiler shall not exceed 0.511 pounds per million British thermal units heat input.

This allowable PM emission rate was calculated with the equation:  $Pt = 1.09/Q^{0.26}$

where: Pt = Pounds of particulate matter (PM) emitted per million British thermal units heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour at time of construction was 18.458 million British thermal units per hour.

**D.1.2 PM<sub>10</sub> Emission Limits [326 IAC 2-8-4]**

The PM<sub>10</sub> emission rate from the:

- (a) Lambion boiler shall not exceed 1.18 pounds per hour, equivalent to 5.18 tons per year.
- (b) Hurst boiler shall not exceed 6.94 pounds per hour, equivalent to 30.4 tons per year.
- (c) Compliance with these PM<sub>10</sub> emission limits and those for the Hurst 2 boiler and woodworking operation, including insignificant activities limits the entire source to less than one hundred (100) tons per year and therefore the requirements of 326 IAC 2-7 are not applicable.

**D.1.3 Wood Waste Throughput Limit For the Lambion Wood Waste Boiler [326 IAC 2-8-4]**

- (a) The total bark and wet wood waste throughput to the Lambion wood waste boiler shall be limited to no more than 1,997.52 tons per twelve (12) consecutive month period with compliance determined at the end of each month with a wood heating value of 5,000 British thermal units per pound of bark and wet wood. This throughput limit is equivalent to 5.99 tons per year of CO.

- (b) Compliance with this throughput limit makes the requirements of 326 IAC 2-7 not applicable to the entire source.

**D.1.4 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 these facilities and their control devices.

**Compliance Determination Requirements**

**D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]**

By January 16, 2006, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM<sub>10</sub> testing of the Hurst wood waste-fired boiler utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

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

**D.1.6 Particulate Control**

In order to comply with Condition D.1.2, the multiple cyclone fly ash arrester for particulate control shall be in operation and control emissions from the Lambion and Hurst wood waste boilers at all times that the boilers are in operation.

**D.1.7 Visible Emissions Notations**

- (a) Visible emissions notations of the Lambion and Hurst wood waste boiler Stack 1 and Stack 2 exhausts 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.1.8 Cyclone Inspections**

An inspection shall be performed within the last month of each calendar quarter of all cyclones controlling the Lambion and Hurst wood waste boilers.

**D.1.9 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 - Emer-

gency Provisions). 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.

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

#### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.3, the Permittee shall maintains records of the total amount of bark and wet wood waste charge to the Lambion wood waste boiler on a monthly basis.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the Lambion and Hurst wood waste boiler Stack 1 and Stack 2 exhausts once per shift.
- (c) 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.
- (d) To document compliance with Condition D.1.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.3 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.2

## FACILITY OPERATION CONDITIONS

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

- (c) One (1) woodworking area equipped with nine (9) generic woodworking machines using water mist dust controls, constructed in 1993, capacity: 3,000 board feet or 12.0 tons of wood per hour, total.

(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 [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 area shall not exceed 21.7 pounds per hour when operating at a process weight rate of 12.0 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:

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

#### D.2.2 PM<sub>10</sub> Emission Limits [326 IAC 2-8-4]

The PM<sub>10</sub> emission rate from the woodworking area shall not exceed 2.97 pounds per hour, equivalent to 13.0 tons per year. Compliance with this PM<sub>10</sub> emission limit and those for the Lambion, Hurst and Hurst 2 wood waste boilers, including insignificant activities limit the entire source to less than one hundred (100) tons per year and therefore the requirements of 326 IAC 2-7 are not applicable.

#### D.2.3 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 these facilities and their control device.

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

#### D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the water mist for particulate control shall be in operation and control emissions from the woodworking area at all times that the woodworking area is in operation.

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking area exhaust 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) 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.

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

**D.2.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking area exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

### SECTION D.3

### FACILITY CONDITIONS

#### Facility Description [326 IAC 2-8-4(10)]: Hurst 2 Wood Waste Boiler

- (d) One (1) wood waste-fired boiler, known as Hurst 2, exhausting at one (1) stack, identified as Stack 3, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 2004, rated at a maximum of 20.1 million British thermal units per hour (600 horsepower).

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

#### Construction Conditions

##### General Construction Conditions

###### D.3.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

##### Effective Date of the Permit

###### D.3.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

###### D.3.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

##### Operation Conditions

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

###### D.3.4 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the Hurst 2 waste wood-fired boiler described in this section except when otherwise specified in 40 CFR 60 Subpart Dc.

###### D.3.5 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Emission limitations for facilities specified in 326 IAC 6-2-1(d)) the particulate emissions from the 20.1 million British thermal units per hour heat input Hurst 2 boiler shall not exceed 0.422 pounds per million British thermal units heat input.

This allowable PM emission rate was calculated with the equation:  $Pt = 1.09/Q^{0.26}$

where: Pt = Pounds of particulate matter (PM) emitted per million British thermal units heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour at time of construction was 38.558 million British thermal units per hour.

D.3.6 PM<sub>10</sub> Emission Limits [326 IAC 2-8-4]

The PM<sub>10</sub> emission rate from the:

- (a) Hurst boiler 2 shall not exceed 6.16 pounds per hour, equivalent to 27.0 tons per year.
- (b) Compliance with these PM<sub>10</sub> emission limit, those for the Hurst and Lambion wood waste boilers as well as those for the woodworking operation, including insignificant activities limits the entire source to less than one hundred (100) tons per year and therefore the requirements of 326 IAC 2-7 are not applicable.

D.3.7 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.

**Compliance Determination Requirements**

D.3.8 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

Within 180 days of start-up, in order to demonstrate compliance with Conditions D.3.5 and D.3.6, the Permittee shall perform PM and PM<sub>10</sub> testing of the Hurst 2 wood waste-fired boiler utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.3.9 Particulate Control

In order to comply with Conditions D.3.5 and D.3.6, the multiple cyclone fly ash arrester for particulate control shall be in operation and control emissions from the Hurst 2 wood waste boiler at all times that the boiler is in operation.

D.3.10 Visible Emissions Notations

- (a) Visible emissions notations of the Hurst 2 wood waste boiler Stack 3 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.3.11 Cyclone Inspections

An inspection shall be performed within the last month of each calendar quarter of all cyclones controlling the Lambion and Hurst wood waste boilers.

D.3.12 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 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, 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.3.13 Record Keeping Requirements

- (a) To document compliance with Condition D.3.10, the Permittee shall maintain records of visible emission notations of the Hurst 2 wood waste boiler Stack 3 exhaust once per shift.
- (b) To document compliance with Condition D.3.11, the Permittee shall maintain records of the results of the inspections required under Condition D.3.11.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.14 Record Keeping Requirements [326 IAC 12] [40 CFR Part 60.40(c), Subpart Dc]

Pursuant to 40 CFR 60.48(c), the Permittee shall maintain records of the design heat input capacity and the identification of fuels combusted in the wood waste-fired boiler, known as Hurst 2.

**SECTION D.4**

**FACILITY OPERATION CONDITIONS**

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

- (e) One (1) sawdust storage bin, capacity: 136 tons of sawdust and 1 ton of sawdust per hour (326 IAC 6-3-2).

(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.4.1 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 sawdust storage bin shall not exceed 4.10 pounds per hour when operating at a process weight rate of 1.0 ton per hour.

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

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

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

Source Name: Frank Miller Lumber Company, Inc.  
Source Address: 1690 Frank Miller Road, Union City, Indiana 47390  
Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390  
FESOP No.: F 135-15494-00029

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

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

Source Name: Frank Miller Lumber Company, Inc.  
Source Address: 1690 Frank Miller Road, Union City, Indiana 47390  
Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390  
FESOP No.: F 135-15494-00029

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - 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

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**

**FESOP Quarterly Report**

Source Name: Frank Miller Lumber Company, Inc.  
Source Address: 1690 Frank Miller Road, Union City, Indiana 47390  
Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390  
FESOP No.: F 135-15494-00029  
Facility: Lambion wood waste boiler  
Parameter: Charge of bark and wet wood  
Limit: 1,997.52 per twelve (12) consecutive month period with compliance determined at the end of each month equivalent to 5.99 tons of CO per year

YEAR: \_\_\_\_\_

Month	Bark and Wet Wood (tons)	Bark and Wet Wood (tons)	Bark and Wet Wood (tons)
	This Month	Previous 11 Months	12 Month Total

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.

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

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

Source Name: Frank Miller Lumber Company, Inc.  
 Source Address: 1690 Frank Miller Road, Union City, Indiana 47390  
 Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390  
 FESOP No.: F 135-15494-00029

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

<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. 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. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "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>	

<b>Permit Requirement</b> (specify permit condition #)	
<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</b> (specify permit condition #)	
<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</b> (specify permit condition #)	
<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>	

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

Form Completed By: \_\_\_\_\_

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

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

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Frank Miller Lumber Company, Inc.</b>
<b>Source Location:</b>	<b>1690 Frank Miller Road, Union City, Indiana 47390</b>
<b>County:</b>	<b>Randolph</b>
<b>SIC Code:</b>	<b>2421</b>
<b>Operation Permit No.:</b>	<b>F 135-15494-00029</b>
<b>Permit Reviewer:</b>	<b>Mark L. Kramer</b>

The Office of Air Quality (OAQ) has reviewed a FESOP Renewal application from Frank Miller Lumber Company, Inc. relating to the construction of a new boiler and the operation of a lumber mill. Frank Miller Lumber Company, Inc. was issued FESOP 135-7345-00029, on April 17, 1998.

**History**

In F 135-7345-00029, issued on April 17, 1998, the wood waste-fired boiler, known as Hurst, was rated at 14.35 million British thermal units per hour. Although the rating of the boiler Hurst is listed as 10.043 million British thermal units per hour on the nameplate on the side of the boiler, the stack test conducted by the source and approved by IDEM, OAQ revealed that the maximum rating was 13.4375 million British thermal units per hour. This correction does not represent new construction, or an increase in emissions. No physical change has taken place since the original boiler was installed.

In addition, IDEM, OAQ has incorporated the Significant Permit Revision (135-18310-00029) application received from Frank Miller Lumber Company, Inc. on December 10, 2003 to add a new wood-fired boiler into the proposed FESOP Renewal.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) wood waste-fired boiler, known as Lambion, exhausting at one (1) stack, identified as Stack 1, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 1983, rated at a maximum of 5.02 million British thermal units per hour.
- (b) One (1) wood waste-fired boiler, known as Hurst, exhausting at one (1) stack, identified as Stack 2, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 1987, rated at a maximum of 13.4375 million British thermal units per hour.
- (c) One (1) woodworking area equipped with nine (9) generic woodworking machines using water mist dust controls, constructed in 1993 with a maximum capacity of 3,000 board feet or 12.0 tons of wood per hour, total.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **New Emission Units and Pollution Control Equipment Receiving New Source Review Approval**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (d) One (1) wood waste-fired boiler, known as Hurst 2, exhausting at one (1) stack, identified as Stack 3, using a multiple cyclone fly ash arrestor for particulate matter control, constructed in 2004, rated at a maximum of 20.1 million British thermal units per hour (600 horsepower).

### **Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 13.432 million British thermal units per hour consisting of:
  - (1) Two (2) aerovent make-up units, rated at 6.50 million British thermal units per hour each.
  - (2) One (1) Luxaire oil furnace converted to natural gas, rated at 0.182 million British thermal units per hour.
  - (3) One (1) Reznor furnace, rated at 0.250 million British thermal units per hour.
- (b) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (d) Other emergency equipment as follows: Stationary electric fire pumps.
- (e) One (1) sawdust storage bin, capacity: 136 tons of sawdust and 1 ton of sawdust per hour. (326 IAC 6-3)

### **Existing Approvals**

The source has been operating under the following previous approvals including:

FESOP 135-7345-00029, issued on April 17, 1998.

The following terms and conditions from previous approvals have been determined to be no longer applicable, and, therefore, are not incorporated into this permit:

- (a) Condition D.1.1(b) specified the allowable PM emission rate for the Hurst boiler rated at 14.35 million British thermal units per hour.

Reason not incorporated:

The wood waste Hurst boiler has had its rating corrected from 14.35 to a maximum of 13.4375 million British thermal units per hour based on the stack test conducted on this boiler and therefore the allowable particulate emission rate will be revised.

- (b) Condition D.1.2 limited the total amount of wood waste throughput to the two (2) boilers to 1,414 tons per month, equivalent to PM<sub>10</sub> emissions of 2.05 tons per month.

Reason not incorporated:

The PM<sub>10</sub> emission calculations have been updated to include the revised rating of the Hurst boiler and the additional of the Hurst 2 boiler. In order to limit the entire source to under the Part 70 Operating Permit threshold of one hundred (100) tons per year for CO, Frank Miller Lumber Company has elected to limit the throughput of wood to the Lambion boiler to 1,997.52 tons of bark and wet wood per twelve (12) consecutive month period with compliance determined at the end of each month. The following PM<sub>10</sub> limits are now required to show compliance with 326 IAC 2-8-4:

- (1) Lambion boiler shall not exceed 1.18 pounds per hour, equivalent to 5.18 tons per year.
  - (2) Hurst boiler shall not exceed 6.94 pounds per hour, equivalent to 30.4 tons per year.
  - (3) Hurst 2 boiler shall not exceed 6.16 pounds per hour, equivalent to 27.0 tons per year.
- (c) Condition D.1.6 required daily visible notations of the wood waste boiler exhausts.

Reason not incorporated:

Visible notations of the wood waste boiler exhausts will be required once per shift, especially in light of the previous Agreed Order No. A-3647 that expired February 3, 1999.

- (d) Condition D.2.2 specified a monthly PM<sub>10</sub> emission rate of 6.12 tons per month for wood-working operation.

Reason not incorporated:

The PM<sub>10</sub> emission rate for the woodworking operation will be specified as an hourly PM<sub>10</sub> emission rate.

- (e) Condition D.2.6(b) specified in order to document compliance with the PM<sub>10</sub> emission limit for woodworking operations, the total wood throughput shall be recorded daily as well as documentation of QA/QC procedures, standard operating procedures, manufacturer's specifications, and equipment troubleshooting contingency plan.

Reason not incorporated:

The PM<sub>10</sub> emission limit is now an hourly limit and no record keeping is required. Testing will be required to verify the Hurst boiler emissions.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal and proposed construction 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 Renewal application for the purposes of this review was received on August 9, 2002 and a Significant Permit Revision application was received December 10, 2003. Additional information was received on August 20, 2002 as well as January 21 and December 22, 2003.

There was no notice of completeness letter mailed to the source.

### Emission Calculations

See Appendix A on pages 1 - 10 of this document for detailed emissions calculations. The emission calculations for the proposed Hurst 2 boiler are shown on pages 5 and 6 of 10. A summary of the emissions are shown on page 10 of 10.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP, but including the proposed Hurst 2 boiler.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	141
PM <sub>10</sub>	135
SO <sub>2</sub>	4.26
VOC	3.51
CO	106.2
NO <sub>x</sub>	43.1

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/year)
Acetaldehyde	0.140
Acrolein	0.676

HAPs	Unrestricted Potential Emissions (tons/year)
Hydrogen Chloride	3.21
Styrene	0.321
Vinyl Chloride	0.003
Xylenes	0.004
Arsenic	0.004
Benzene	0.710
Dichlorobenzene	0.001
Formaldehyde	0.747
Hexane	0.106
Toluene	0.002
Lead Compounds	0.008
Cadmium Compounds	0.00006
Chromium Compounds	0.004
Manganese Compounds	0.270
Nickel Compounds	0.006
Other Insignificant Activities	1
TOTAL	7.21

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of  $PM_{10}$  is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) 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.

**Potential To Emit of Proposed New Emission Unit (Hurst 2 Boiler)**

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 proposed Hurst 2 wood waste fired boiler. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	29.1
PM <sub>10</sub>	27.0
SO <sub>2</sub>	2.20
VOC	1.14
CO	52.8
NO <sub>x</sub>	19.4

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
Acetaldehyde	0.073
Acrolein	0.352
Hydrogen Chloride	1.67
Styrene	0.167
Vinyl Chloride	0.002
Xylenes	0.002
Arsenic	0.002
Benzene	0.370
Formaldehyde	0.387
Manganese Compounds	0.141
Lead Compounds	0.004
Chromium Compounds	0.002
Nickel Compounds	0.003
<b>TOTAL</b>	<b>3.18</b>

The addition of the proposed Hurst 2 boiler into the FESOP Renewal is being performed at the level of a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1) since the potential to emit PM and PM<sub>10</sub> are greater than twenty five (25) tons per year each.

The addition of the proposed Hurst 2 boiler also increases the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of CO to greater than or equal to one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Potential to Emit After Issuance**

The source has opted continue to operate under a FESOP. 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 the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. The source's

potential to emit is based on the emission units included in the original FESOP (F 135-7345-00029; issued on April 17, 1998) plus the proposed Hurst 2 boiler.

Process/Emission Units	Potential to Emit After Issuance (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Lambion Boiler	5.59	5.18	0.250	0.130	5.99	2.20	0.362
Hurst Boiler	30.1	30.4	1.47	0.765	35.3	13.0	2.12
Hurst 2 Boiler	37.1	27.0	2.20	1.14	52.8	19.4	3.18
Woodworking	13.0	13.0	-	-	-	-	-
Insignificant Activity Natural Gas Comb.	0.112	0.447	0.035	0.324	4.94	5.88	0.111
Other Insig. Act.	1.00	1.00	-	1.00	-	-	1.00
Total PTE After Issuance	86.9	77.0	3.96	3.36	99.0	40.4	Single less than 10 Total less than 25

The CO emissions of 5.99 tons per year from the Lambion wood waste boiler are based on a limited bark and wet wood throughput of 1,997.52 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The particulate and PM<sub>10</sub> emission rates for the Lambion wood waste boiler are equivalent to the limited emission rates before controls.

The PM emission from the Hurst and Hurst 2 wood waste boilers are based on the allowable particulate emission rates pursuant to 326 IAC 6-2-4. The PM<sub>10</sub> emission rate for each boiler is the uncontrolled potential to emit PM<sub>10</sub>.

The PM and PM<sub>10</sub> emission rates from the woodworking operation reflect an 80% control efficiency rather than the stated 90% control used in the emission calculations for conservatism and to allow leeway for stack testing, if required.

### County Attainment Status

The source is located in Randolph County.

Pollutant	Status
PM <sub>10</sub>	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. Randolph County has been designated as attainment or unclassifiable for ozone.
- (b) Randolph County has been classified as attainment, maintenance attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Federal Rule Applicability**

- (a) The Lambion wood waste boiler constructed in 1983 and rated at 5.02 million British thermal units per hour is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40(c)), Subpart Dc, since the boiler was installed prior to the June 9, 1989 applicability date of NSPS Subpart Dc.
- (b) The Hurst wood waste boiler constructed in 1987 and rated at a maximum of 13.4375 million British thermal units per hour is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40(c)), Subpart Dc, since the boiler was installed prior to the June 9, 1989 applicability date of NSPS Subpart Dc.

The Hurst wood waste boiler constructed in 1987 and rated at 13.4375 million British thermal units per hour installed after the June 19, 1984 applicability date of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40(b)), Subpart Db is not subject to the requirements of Subpart Da because the boiler is not rated at greater than 100 million British thermal units per hour.

The Hurst wood waste boiler constructed in 1987 and rated at 13.4375 million British thermal units per hour installed after the September 18, 1978 applicability date of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40(a)), Subpart Da is not subject to the requirements of Subpart Da because the boiler is not a utility boiler and is not greater than 250 million British thermal units per hour.

- (c) The Hurst 2 wood waste boiler to be constructed in 2004 and rated at 20.1 million British thermal units per hour is subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40(c)), Subpart Dc, since the boiler will be installed after the June 9, 1989 applicability date of NSPS Subpart Dc. This proposed 20.1 million British thermal units per hour boiler will not be subject to the emission limitations and opacity limitations pursuant to Subpart Dc since the wood waste fired boiler has a rating of less than 30 million British thermal units per hour. The proposed Hurst 2 wood waste-fired boiler is subject to the record keeping requirements of 40 CFR 60.48(c). This rule requires the Permittee to keep records of the design heat input capacity and the identification of fuels combusted.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The entire source constructed after the PSD applicability date of August 7, 1977, has a potential to emit that is less than 250 tons per year for each of the criteria pollutants and therefore is a minor PSD source.

### 326 IAC 2-6 (Emission Reporting)

This source is located in Randolph County and the potential to emit PM<sub>10</sub> is less than one hundred (100) tons per year. Therefore 326 IAC 2-6 does not apply.

### 326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM<sub>10</sub> shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. PM<sub>10</sub> emissions from the Lambion wood waste boiler will be limited to 1.18 pounds per hour, equivalent to 5.18 tons per year. PM<sub>10</sub> emissions from the Hurst wood waste boiler will be limited to 6.94 pounds per hour, equivalent to 30.4 tons per year. PM<sub>10</sub> emissions from the Hurst 2 wood waste boiler will be limited to 6.16 pounds per hour, equivalent to 27.0 tons per year. PM<sub>10</sub> emissions from the woodworking operation will be limited to 2.97 pounds per hour, equivalent to 13.0 tons per year. Therefore the source-wide PM<sub>10</sub> emissions including insignificant activities will be limited to less than one hundred (100) tons per year.

Pursuant to this rule, the amount of CO shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. The throughput of wood waste to the Lambion boiler has been limited to no more than 1,997.52 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This throughput limit coupled with the unrestricted potential to emit CO from the two (2) other boilers and insignificant natural gas combustion assures that the entire source will comply with the requirements of 326 IAC 2-8-4.

### 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 Part 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 2-4.1-1 (New source toxics control)

The proposed new Hurst 2 wood waste-fired boiler is not subject to the requirements of this rule because the potential to emit HAPs is less than the major HAPs thresholds of 10/25 tons per year for a single/combination of HAPs.

#### 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

- (a) Lambion Wood Waste Boiler

Pursuant to 326 IAC 6-2-4, the Lambion wood waste fired boiler, constructed in 1983, rated at 5.02 million British thermal units per hour is subject to the following limit:

$$Pt = 1.09/Q^{0.26}$$

Where: Pt = Pounds of particulate matter (PM) emitted per million British thermal units heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour at time of construction was 5.02 million British thermal units per hour.

The calculated Pt for the Lambion wood waste boiler is 0.72 pounds per million British thermal units heat input. Since the calculated allowable particulate matter emission rate exceeds 0.60 pounds per million British thermal units, pursuant to the 326 IAC 6-2-4(a), the allowable particulate matter emission rate shall not exceed 0.60 pounds per million British thermal units heat input, equivalent 3.01 pounds per hour (13.2 tons per year).

The particulate matter emission factor after controls for the Lambion wood waste boiler is 0.350 pounds per million British thermal units as shown on page 1 of 10 of Appendix A, and therefore complies with this rule.

(b) Hurst Wood Waste Boiler

Pursuant to 326 IAC 6-2-4, the Hurst wood waste fired boiler, constructed in 1987 rated at a maximum of 13.4375 million British thermal units per hour is subject to the following limit:

$$Pt = 1.09/Q^{0.26}$$

Where: Pt = Pounds of particulate matter (PM) emitted per million British thermal units heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour at time of construction was 18.458 million British thermal units per hour.

The calculated Pt for the Hurst wood waste boiler is 0.511 pounds per million British thermal units heat input, equivalent to 6.86 pounds per hour (30.1 tons per year).

The particulate matter emission factor after controls for the Hurst wood waste boiler is 0.224 pounds per million British thermal units as shown on page 3 of 10 of Appendix A, and therefore the Hurst boiler complies with this rule.

(c) Hurst 2 Wood Waste Boiler

Pursuant to 326 IAC 6-2-4, the Hurst 2 wood waste fired boiler, to be constructed in 2004 rated at 20.1 million British thermal units per hour is subject to the following limit:

$$Pt = 1.09/Q^{0.26}$$

Where: Pt = Pounds of particulate matter (PM) emitted per million British thermal units heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour at time of construction was 38.558 million British thermal units per hour.

The calculated Pt for the Hurst 2 wood waste boiler is 0.422 pounds per million British thermal units heat input, equivalent to 8.48 pounds per hour (37.1 tons per year).

The particulate matter emission factor after controls for the Hurst 2 wood waste boiler is 0.350 pounds per million British thermal units as shown on page 5 of 10 of Appendix A, and therefore the Hurst 2 boiler complies with this rule.

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The particulate from the woodworking area shall not exceed 21.7 pounds per hour when operating at a process weight rate of 12.0 tons per hour. This limitation is based upon 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:

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

The water mist controls shall be in operation at all times the woodworking area is in operation, in order to comply with this limit.

Since the total controlled particulate emissions from the woodworking area are 1.48 pounds per hour (6.50 tons per year), the work working area complies with the rule.

#### State Rule Applicability - Insignificant Activities

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the sawdust storage bin shall not exceed the pounds per hour limitation calculated using the following equations:

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

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

The particulate from the saw dust storage bin shall not exceed 4.10 pounds per hour when operating at a process weight rate of 1.0 ton per hour. This limitation is based upon 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:

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

#### Testing Requirements

- (a) Previous Stack Test

Previous stack tests to comply with the PM and PM<sub>10</sub> limits for the Hurst wood waste boiler were conducted on January 16, 2001.

According to Frank Miller Lumber Company, the old rating of 14.35 million British thermal units per hour should be 10.043 million British thermal units per hour. However, the IDEM, OAQ approved stack test demonstrated that the maximum rating is of this boiler is actually 13.4375 million British thermal units per hour.

The IDEM, OAQ stack results of 0.224 pounds of PM per million British thermal units set equivalent to 3.01 pounds per hour, implies that the Hurst boiler was operating at 13.4375 million British thermal units per hour.

The stack tests showed that the PM emission rate was 3.01 pounds per hour and the filterable PM<sub>10</sub> emission rate was 3.48 pounds per hour, equivalent to a PM emission rate of 0.224 pounds per million British thermal units, and is less than the allowable of 0.50 pounds per million British thermal units. This stack tested emission factor is less than the AP-42 PM emission factor for bark and wet wood of 0.56 pounds per million British thermal units per hour.

The stack test results for PM<sub>10</sub> showed an emission rate of 3.55 pounds per hour which was less than the allowable PM<sub>10</sub> emission rate of 5.61 pounds per hour and is equivalent to 0.264 pounds per million British thermal units per hour (3.55 lbs/hr / 13.4375 million British thermal units per hour).

(b) Proposed Stack Test

- (1) By January 16, 2006 in order to show compliance with 326 IAC 6-2-4 and 326 IAC 2-8-4, the Permittee shall perform PM and PM<sub>10</sub> testing for 13.4375 million British thermal units per hour Hurst wood-waste boiler utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>. Testing shall be conducted in accordance with Section C-Performance Testing.
- (2) Within 180 days of start-up of the proposed Hurst 2 wood waste-fired boiler, in order to demonstrate compliance with the 326 IAC 2-8-4 and 326 IAC 6-2-4 emission limits, the Permittee shall perform PM and PM<sub>10</sub> testing for utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>.

### 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 Monitor-

ing 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.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

- (a) Visible emissions notations of the Lambion, Hurst and Hurst 2 wood waste boiler Stacks 1 2 and 3 exhausts shall be performed once per shift during normal daylight operations. A trained employee will 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. 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.
- (b) Daily visible emissions notations of the woodworking area shall be performed during normal daylight operations. A trained employee will 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. 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.

The following new compliance requirements were incorporated into this FESOP:

- (c) An inspection shall be performed within the last month of each calendar quarter of all cyclones controlling the Lambion, Hurst and Hurst 2 wood waste boilers.
- (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 proposed permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the cyclones and water mist for the wood waste boilers and the woodworking operation must operate properly to ensure compliance with 326 IAC 6-2-4, 326 IAC 6-3-2 and 326 IAC 2-8 (FESOP).

**Conclusion**

The construction of the Hurst 2 wood waste-fired boiler and the operation of this lumber mill shall be subject to the conditions of the attached proposed FESOP Renewal No.: F 135-15494-00029.

**Appendix A: Emission Calculations  
Wood Waste Combustion in Boilers**

**Company Name: Frank Miller Lumber Company, Inc.  
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390  
FESOP: F 135-15494  
Plt ID: 135-00029  
Reviewer: Mark L. Kramer  
Application Date: August 9, 2001**

Lambion Wood Waste Boiler

Heat Input Capacity (MMBtu/hr)	Wood Throughput (tons/year)	Heating Val (Btu/lb)	Limited Wood Throughput (tons/year)	Moisture (%)	
5.02	4397.52	5000	1997.52	50.0	Wet wood has a moisture content of 20% or more

Fuel Type	Uncontrolled Emissions	Pollutant						
		PM*	PM10	SO2	NOx	VOC	CO	Lead
Bark	Uncontrolled Emission Factor in lb/MMBtu	0.56	0.517	0.025	0.22	0.013	0.60	0.000048
Bark & Wet Wood	Uncontrolled Emission Factor in lb/MMBtu	0.56	0.517	0.025	0.22	0.013	0.60	0.000048
Dry Wood	Uncontrolled Emission Factor in lb/MMBtu	0.40	0.377	0.025	0.49	0.013	0.60	0.000048
Wet Wood	Uncontrolled Emission Factor in lb/MMBtu	0.33	0.307	0.025	0.22	0.013	0.60	0.000048
Bark & Wet Wood	Uncontrolled Potential Emission in tons/yr	12.3	11.4	0.550	4.84	0.286	13.2	0.0011

\* PM is filterable only. PM-10 emission factors include the condensible PM emission factor of 0.017 pounds per mmBtu, measured by EPA Method 202 or equivalent  
Heating value of Bark and Wet Wood is 5,000 Btu/lb

**Emission Factors for PM, PM-10, NOx and CO change based on the type of wood burned. Emission factors are as follows for controls:**

Fuel Type	Controlled Emissions	PM*	PM10	SO2	NOx	VOC	CO	Lead
Bark	<b>Emission Factor</b>	lbs/mmBtu						
Bark	Mechanical Collector	0.540	0.507	See Above				
Bark & Wet Wood	Mechanical Collector	0.350	0.337	See Above				
Dry Wood	Mechanical Collector	0.300	0.287	See Above				
Wet Wood	Mechanical Collector	0.220	0.217	See Above				
All Fuels	Electrolized Gravel Bed	0.100	0.091	See Above				
All Fuels	Wet Scrubber	0.066	0.082	See Above				
All Fuels	Fabric Filter	0.100	0.091	See Above				
All Fuels	ESP	0.054	0.057	See Above				
Bark & Wet Wood	<b>After Control (tons/yr)</b>	7.70	7.41	0.550	4.837	0.286	13.193	0.001
	<b>Controlled &amp; Limited (tons/yr)</b>	3.50	3.37	0.250	2.20	0.130	5.99	0.0005

**Methodology**

**PM10 emission factor after controls based on the Frank Miller Lumber Company Hurst Boiler Stack Test - See TSD Description**

AP-42 Heating Value of Wood = 4500 Btu/lb

Emission Factors from AP-42, Chap. 1.6, March 2002

Emission (tons/yr) = Heat Input Capacity (MMBtu/hr X Emission Factor (lb/MMBtu) X 8,760 hrs/yr X [1 ton/2000 lbs]

**Appendix A: Emission Calculations  
Wood Waste Combustion in Boilers  
HAPs Emissions**

**Company Name: Frank Miller Lumber Company, Inc.  
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390  
FESOP: F 135-15494  
Plt ID: 135-00029  
Reviewer: Mark L. Kramer  
Application Date: August 9, 2001**

HAPs - Organics

	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Vinyl Chloride	Xylenes
Emission Factor in lb/MMBtu	8.3E-04	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.8E-05	2.5E-05
Potential Emission in tons/yr	0.01825	0.08795	0.09235	0.09675	0.41776	0.04178	0.00040	0.00055
Limited Potential Emission in tons/yr	0.00829	0.03995	0.04195	0.04395	0.18976	0.01898	0.00018	0.00025

HAPs - Metals

	Arsenic	Chromium	Lead	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMBtu	2.2E-05	2.1E-05	4.8E-05	1.6E-03	3.3E-05	
Potential Emission in tons/yr	0.00048	0.00046	0.00106	0.03518	0.00073	<b>0.794</b>
Limited Potential Emission in tons/yr	0.00022	0.00021	0.00048	0.01598	0.00033	<b>0.361</b>

Methodology is the same as page 1.

The eight highest organic HAPs and the five highest metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.6.

**Appendix A: Emission Calculations  
Wood Waste Combustion in Boilers**

**Company Name: Frank Miller Lumber Company, Inc.  
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390  
FESOP: F 135-15494  
Plt ID: 135-00029  
Reviewer: Mark L. Kramer  
Application Date: August 9, 2001**

Hurst Wood Waste Boiler

Heat Input  
Capacity  
(MMBtu/hr)

13.4375

Moisture  
(%)

50.0

Wet wood has a moisture content of 20% or more

Fuel Type	Uncontrolled Emissions	Pollutant						
		PM*	PM10	SO2	NOx	VOC	CO	Lead
Bark	Uncontrolled Emission Factor in lb/MMBtu	0.560	0.517	0.025	0.220	0.013	0.600	0.000048
Bark & Wet Wood	Uncontrolled Emission Factor in lb/MMBtu	0.560	0.517	0.025	0.220	0.013	0.600	0.000048
Dry Wood	Uncontrolled Emission Factor in lb/MMBtu	0.400	0.377	0.025	0.490	0.013	0.600	0.000048
Wet Wood	Uncontrolled Emission Factor in lb/MMBtu	0.330	0.307	0.025	0.220	0.013	0.600	0.000048
Bark & Wet Wood	Uncontrolled Potential Emission in tons/yr	33.0	30.4	1.47	12.95	0.765	35.3	0.0028

\* PM is filterable only. PM-10 emission factors include the condensible PM emission factor of 0.017 pounds per mmBtu, measured by EPA Method 202 or equivalent

**Emission Factors for PM, PM-10, NOx and CO change based on the type of wood burned. Emission factors are as follows for controls:**

Fuel Type	Controlled Emissions	PM*	PM10	SO2	NOx	VOC	CO	Lead
	<b>Emission Factor</b>	lbs/mmBtu						
Bark	Mechanical Collector	0.540	0.507	See Above				
Bark & Wet Wood	Mechanical Collector	0.224	0.264	See Above				
Dry Wood	Mechanical Collector	0.300	0.287	See Above				
Wet Wood	Mechanical Collector	0.220	0.217	See Above				
All Fuels	Electrolized Gravel Bed	0.100	0.091	See Above				
All Fuels	Wet Scrubber	0.066	0.082	See Above				
All Fuels	Fabric Filter	0.100	0.091	See Above				
All Fuels	ESP	0.054	0.057	See Above				
Bark & Wet Wood	<b>Type of Control</b>	13.2	15.5	See Above				

**Methodology**

**PM & PM10 emission factors after control based on the Frank Miller Lumber Company Hurst Boiler Stack Test of 1/16/01 - See TSD Description**

AP-42 Heating Value of Wood = 4500 Btu/lb

Emission Factors from AP-42, Chap. 1.6, March 2002

Emission (tons/yr) = Heat Input Capacity (MMBtu/hr X Emission Factor (lb/MMBtu) X 8,760 hrs/yr X [1 ton/2000 lbs]

**Appendix A: Emission Calculations  
Wood Waste Combustion in Boilers  
HAPs Emissions**

**Company Name: Frank Miller Lumber Company, Inc.  
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390  
FESOP: F 135-15494  
Plt ID: 135-00029  
Reviewer: Mark L. Kramer  
Application Date: August 9, 2001**

HAPs - Organics

	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Vinyl Chloride	Xylenes
Emission Factor in lb/MMBtu	8.3E-04	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.8E-05	2.5E-05
Potential Emission in tons/yr	0.04885	0.23543	0.24720	0.25897	1.11827	0.11183	0.00106	0.00147

HAPs - Metals

	Arsenic	Chromium	Lead	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMBtu	2.2E-05	2.1E-05	4.8E-05	1.6E-03	3.3E-05	
Potential Emission in tons/yr	0.00129	0.00124	0.00283	0.09417	0.00194	<b>2.12</b>

Methodology is the same as page 3.

The eight highest organic HAPs and the five highest metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.6.

**Appendix A: Emission Calculations  
Wood Waste Combustion in Boilers**

**Company Name: Frank Miller Lumber Company, Inc.  
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390  
FESOP: F 135-15494  
Plt ID: 135-00029  
Reviewer: Mark L. Kramer  
NSR Application Date: December 10, 2003**

Hurst 2 Wood Waste Boiler

Heat Input  
Capacity  
(MMBtu/hr)

20.100

Moisture  
(%)

50.0

Wet wood has a moisture content of 20% or more

Fuel Type	Uncontrolled Emissions	Pollutant						
		PM*	PM10	SO2	NOx	VOC	CO	Lead
Bark	Uncontrolled Emission Factor in lb/MMBtu	0.56	0.517	0.025	0.22	0.013	0.60	0.000048
Bark & Wet Wood	Uncontrolled Emission Factor in lb/MMBtu	0.56	0.517	0.025	0.22	0.013	0.60	0.000048
Dry Wood	Uncontrolled Emission Factor in lb/MMBtu	0.40	0.377	0.025	0.49	0.013	0.60	0.000048
Wet Wood	Uncontrolled Emission Factor in lb/MMBtu	0.33	0.307	0.025	0.22	0.013	0.60	0.000048
<b>Wet Wood</b>	Uncontrolled Potential Emission in tons/yr	29.1	27.0	2.20	19.37	1.14	52.8	0.0042

\* PM is filterable only. PM-10 emission factors include the condensible PM emission factor of 0.017 pounds per mmBtu, measured by EPA Method 202 or equivalent

**Emission Factors for PM, PM-10, NOx and CO change based on the type of wood burned. Emission factors are as follows for controls:**

Fuel Type	Controlled Emissions	PM*	PM10	SO2	NOx	VOC	CO	Lead
	<b>Emission Factor</b>	lbs/mmBtu						
Bark	Mechanical Collector	0.540	0.507	See Above				
Bark & Wet Wood	Mechanical Collector	0.350	0.337	See Above				
Dry Wood	Mechanical Collector	0.300	0.287	See Above				
Wet Wood	Mechanical Collector	0.220	0.217	See Above				
All Fuels	Electrolized Gravel Bed	0.100	0.091	See Above				
All Fuels	Wet Scrubber	0.066	0.082	See Above				
All Fuels	Fabric Filter	0.100	0.091	See Above				
All Fuels	ESP	0.054	0.057	See Above				
Wet Wood	<b>Type of Control</b>	19.4	19.1	See Above				

**Methodology**

The PM-10 emission factor includes the condensible PM emission factor of 0.017 lbs/mmBtu, measured by EPA Method 2002 or equivalent

AP-42 Heating Value of Wood = 4500 Btu/lb

Emission Factors from AP-42, Chap. 1.6, March 2002

Emission (tons/yr) = Heat Input Capacity (MMBtu/hr X Emission Factor (lb/MMBtu) X 8,760 hrs/yr X [1 ton/2000 lbs]

**Appendix A: Emission Calculations  
Wood Waste Combustion in Boilers  
HAPs Emissions**

**Company Name: Frank Miller Lumber Company, Inc.  
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390  
FESOP: F 135-15494  
Plt ID: 135-00029  
Reviewer: Mark L. Kramer  
NSR Application Date: December 10, 2003**

HAPs - Organics

	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Vinyl Chloride	Xylenes
Emission Factor in lb/MMBtu	8.3E-04	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.8E-05	2.5E-05
Potential Emission in tons/yr	0.07307	0.35215	0.36976	0.38737	1.67272	0.16727	0.00158	0.00220

HAPs - Metals

	Arsenic	Chromium	Lead	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMBtu	2.2E-05	2.1E-05	4.8E-05	1.6E-03	3.3E-05	
Potential Emission in tons/yr	0.00194	0.00185	0.00423	0.14086	0.00291	<b>3.18</b>

Methodology is the same as page 5.

The eight highest organic HAPs and the five highest metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.6.

**Appendix A: Emission Calculations  
Woodworking Machines**

**Company Name:** Frank Miller Lumber Company, Inc.  
**Address City IN Zip:** 1690 Frank Miller Road, Union City, IN 47390  
**FESOP:** F 135-15494  
**Plt ID:** 135-00029  
**Reviewer:** Mark L. Kramer  
**Application Date:** August 9, 2001

Unit I.D.	Material	Uncontrolled PM-10* (tons/yr)	Control Efficiency	Controlled PM-10 (tons/yr)
L&B Headsaw	sawdust	5.0	90%	0.500
Salem Resaw	sawdust	5.0	90%	0.500
Salem Edger	sawdust	9.0	90%	0.900
Salem Trim Saw	sawdust	12.0	90%	1.200
Trim Saw	sawdust	3.0	90%	0.300
Trim Saw	sawdust	3.0	90%	0.300
S/L Rip Saw	sawdust	2.0	90%	0.200
Planer	sawdust	12.0	90%	1.200
Fulghum	sawdust	14.0	90%	1.400

**Total Uncontrolled PM-10** 65.0 (tons/yr)    **Total Controlled PM-10** 6.50 (tons/yr)

**Methodology**

All data supplied from GSD-07 of FESOP  
 Water mist dust control efficiency = 90%

\*Best engineering judgment by the applicant

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Frank Miller Lumber Company, Inc.  
**Address City IN Zip:** 1690 Frank Miller Road, Union City, IN 47390  
**FESOP:** F 135-15494  
**Plt ID:** 135-00029  
**Reviewer:** Mark L. Kramer  
**Application Date:** August 9, 2001

**Insignificant Activities**  
**Natural Gas Consumption**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Facility	Total Rating mmBtu/hr
		2 Airovent Air Make-up @ 6.5	13.000
		1 Luxaire Oil Furnace Converted to Gas	0.182
		1 Reznor Furnace	0.250
		<b>Total</b>	<b>13.432</b>
13.4320	117.66		

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.112	0.447	0.0353	5.883	0.324	4.942

\*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

See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Company Name: Frank Miller Lumber Company, Inc.  
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390  
FESOP: F 135-15494  
Plt ID: 135-00029  
Reviewer: Mark L. Kramer  
Application Date: August 9, 2001**

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	0.0001	0.0001	0.0044	0.1059	0.0002

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	Total HAPs
Potential Emission in tons/yr	0.00003	0.00006	0.00008	0.00002	0.00012	0.111

Methodology is the same as page 6.

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: Emissions Calculations  
SUMMARY**

**Company Name: Frank Miller Lumber Company, Inc.**  
**Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390**  
**FESOP: F 135-15494**  
**Plt ID: 135-00029**  
**Reviewer: Mark L. Kramer**  
**Application Date: August 9, 2001**

Emission Unit	Potential Emissions	Pollutant (tons/year)							
		PM	PM-10	SO2	NOx	VOC	CO	HAPs	
Lambion WW Boiler	Before Controls	12.3	11.4	0.550	4.84	0.286	13.2	0.7951	
	After Controls	7.70	7.41	0.550	4.84	0.286	13.2	0.7951	
	Limited After Controls	3.50	3.37	0.250	2.200	0.130	5.99	0.3615	
Hurst WW Boiler	Before Controls	33.0	30.4	1.47	13.0	0.765	35.3	2.1228	
	After Controls	13.2	15.5	1.47	13.0	0.765	35.3	2.1228	
Hurst 2 WW Boiler	Before Controls	29.1	27.0	2.20	19.4	1.14	52.8	3.1842	
	After Controls	19.4	19.1	2.20	19.4	1.14	52.8	3.1842	
Woodworking	Before Controls	65.0	65.0	0.000	0.000	0.000	0.000	0.000	
	After Controls	6.50	6.50	0.000	0.000	0.000	0.000	0.000	
Insignificant Activity									
Natural Gas	Before Controls	0.112	0.447	0.035	5.88	0.324	4.942	0.111	
	After Controls	0.112	0.447	0.035	5.88	0.324	4.942	0.111	
Other Insignificant Activities	Before Controls	1.000	1.000	0.000	0.000	1.000	0.000	1.000	
	After Controls	1.000	1.000	0.000	0.000	1.000	0.000	1.000	
<b>Total</b>	Before Controls	<b>141</b>	<b>135</b>	<b>4.26</b>	<b>43.1</b>	<b>3.51</b>	<b>106.2</b>	<b>7.21</b>	
	After Controls	<b>47.9</b>	<b>50.0</b>	<b>4.26</b>	<b>43.1</b>	<b>3.51</b>	<b>106.2</b>	<b>7.21</b>	
	Limited After Controls	<b>43.7</b>	<b>45.9</b>	<b>3.96</b>	<b>40.4</b>	<b>3.36</b>	<b>99.0</b>	<b>6.78</b>	