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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 10, 2007

RE: Koetter Woodworking, Inc. / 019-15610-00079

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Koetter Woodworking, Inc.
533 Louis Smith Road
Borden, Indiana 47106

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

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

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

Operation Permit No.: T019-15610-00079	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:July 10, 2007 Expiration Date:July 10, 2012

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

TABLE OF CONTENTS (Continued)

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary saw and millwork facility and wood molding production plant.

Source Address:	533 Louis Smith Road, Borden, Indiana 47106
Mailing Address:	533 Louis Smith Road, Borden, Indiana 47106
General Source Phone Number:	812-923-4575
SIC Code:	2426
County Location:	Clark
Source Location Status:	Nonattainment for PM2.5 and the 8-hour ozone standard Attainment for all other criteria pollutants Nonattainment for PM2.5
Source Status:	Part 70 Permit Program Minor Source under PSD, Emission Offset Rules and nonattainment area NSR; Minor Source under Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) wood-fired boiler (identified as unit EU-01A), constructed in 1979, with a maximum heat input of 1.8 MMBtu per hour without control. Emissions are exhausted through stack S-1.

(b) One (1) wood/paper-fired boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without control. Emissions are exhausted through stack S-1.

(c) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

(d) One (1) vacuum coating system (identified as unit EU-02), constructed in 1996, with a maximum throughput rate of 12,000 linear feet of wood molding per hour, using a flow-coating application method.

(e) Woodworking operations (identified as WW1), constructed in the 1960s and modified in 1996, with a maximum process rate of 31,047 pounds of wood per hour. Particulate matter emissions are controlled by ten (10) baghouses (identified as DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7).

(f) Mill and saw-work activities, constructed in the 1960s, including:

(1) Lumber processing conducted in building No. 2, with a maximum throughput capacity of 17,308 pounds of lumber per hour.

(2) Waste lumber processing conducted in building No.2, with a maximum throughput capacity of 1,731 pounds per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

(a) A petroleum fuel, other than gasoline, dispensing facility, each having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day [326 IAC 8-9], including:

(1) One (1) 500 gallon storage tank (identified as Tank 9) constructed in 2000.

(2) Two (2) 1,000 gallon storage tanks (identified as Tanks 1 and 2) constructed in 1992.

(3) One (1) 1,000 gallon storage tank (identified as Tank 15B) constructed in 2000.

(4) Ten (10) 1,000 gallon storage tanks (identified as Tank 3 through Tank 8, Tank 10 through Tank 12, and Tank 15A) constructed in 2001.

(b) Propane or liquid petroleum gas, or butane-fired combustion units with heat input of equal to or less than six million (6,000,000) Btu per hour [326 IAC 6.5-1-2(6)], including:

(1) One (1) propane boiler, with a maximum heat input capacity of 2 MMBtu per hour.

(2) One (1) propane oven, with a maximum heat input capacity of 0.66 MMBtu per hour.

(c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21. [326 IAC 6.5-1-2(a)]

(d) Emission units and activities whose potential uncontrolled emissions equal to or less than 0.6 ton per year of lead (3.29 pounds per day), 5 pounds per hour of sulfur dioxide (25 pounds per day), 5 pounds per hour of nitrogen oxides (25 pounds per day), 25 pounds per day of carbon monoxide, 5 pounds per hour of PM10(25 pounds per day), 3 pounds per hour of volatile organic compounds (15 pounds per day), including:

(1) Sawdust handling and storage with maximum throughput capacity of 361 pounds of sawdust per hour. [326 IAC 6.5-1-2(a)]

(2) Truck loading with a maximum throughput capacity of 5,192 pounds of waste per hour. [326 IAC 6.5-1-2(a)]

(e) One (1) emergency generator with a maximum heat input capacity of 5.7 MMBtu per hour. [326 IAC 6.5-1-2(a)]

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

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

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

(a) This permit, T019-15610-00079, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by condition(s) in a D section of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

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

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

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.11 Emergency Provisions [326 IAC 2-7-16]

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

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T019-15610-00079 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

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

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(3) Any change in emissions; and

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]

(a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

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

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

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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.2 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.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:
(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-6(1)]

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

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

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

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

Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

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

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.

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

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

C.12 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 has prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:.

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

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

(c) If there is a "project" (as defined in 326 IAC 2-3-1 (ll) at an existing emissions unit), which is not part of a "major modification" (as defined in 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

(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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1(ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 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 2-7-5(15)]:

(a) One (1) wood-fired boiler (identified as unit EU-01A), constructed in 1979, with a maximum heat input of 1.8 MMBtu per hour without controls. Emissions are exhausted through stack S-1.

(b) One (1) wood/paper-fired boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without controls. Emissions are exhausted through stack S-1.

(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 2-7-5(1)]

D.1.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

Pursuant to 326 IAC 6.5-1-2(b)(1)(C)(formerly 326 IAC 6-1-2(b)), the particulate matter emissions from the 1.8 MMBtu per hour boiler and the 2.5 MMBtu per hour boiler shall be limited to 0.6 pounds per million Btu.

D.1.2 Special Conditions

The Permittee shall use only clean paper, including shredded currency, which is not contaminated with other types of waste as a supplemental fuel for the 2.5 MMBtu per hour boiler identified as EU-01B.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the boiler stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(c) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-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 2-7-5(1)]

D.2.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

Pursuant to 326 IAC 6.5-1-2(b)(1)(B)(formerly 326 IAC 6-1-2(b)), the particulate matter emissions from the 29.9 MMBtu per hour boiler shall be limited to 0.35 pounds per million Btu.

D.2.2 General Provision 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 by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

D.2.3 Particulate Matter and Sulfur Dioxide [326 IAC 12-1] [40 CFR 60, Subpart Dc]

The 29.9 MMBtu per hour boiler (unit EU-01C) is subject to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units); however, there are no applicable emission limitations for this boiler, only record keeping requirements as described in Condition D.2.11.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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.2.5 Particulate

In order to comply with Condition D.2.1, the cyclone used for particulate control shall be in operation at all times when the 29.9 MMBtu per hour boiler is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Visible emission notations of the boiler stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).

(b) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall maintain the following records:

(1) Monthly fuel records.

(2) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period.

(c) Pursuant to 326 IAC 12, the Permittee shall maintain daily records of the amounts of each fuel combusted. This requirement is not federally enforceable.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements [40 CFR 60, Subpart Dc]

The Permittee shall submit a signed certification that certifies the type of fuel combusted in the boilers during the period. The boiler certification shall be submitted semiannually to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by a "Responsible Official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) One (1) vacuum coating system (identified as unit EU-02), constructed in 1996, with a maximum throughput rate of 12,000 linear feet of wood molding per hour, using a flow-coating application method.

(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 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) Woodworking operations (identified as WW1), constructed in the 1960s and modified in 1996, with a maximum process rate of 31,047 pounds of wood per hour. Particulate matter emissions are controlled by ten (10) baghouses (identified as DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7).

(f) Mill and saw-work, constructed in the 1960s, activities including:

(1) Lumber processing conducted in building No. 2, with a maximum throughput capacity of 17,308 pounds of lumber per hour.

(2) Waste lumber processing conducted in building No. 2, with a maximum throughput capacity of 1,731 pounds per hour.

Insignificant Activities

(c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21. [326 IAC 6.5-1-2(a)]

(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 2-7-5(1)]

D.4.1 Particulate Matter [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a)(formerly 326 IAC 6-1-2(a)), particulate matter emissions from the woodworking facilities shall be limited to 0.03 grain per dry standard cubic foot.

D.4.2 PSD Minor Limitation [326 IAC 2-2]

The PM and PM10 emissions from the woodworking operations (identified as WW1) and the insignificant grinding and machining operations shall be limited by the following:

Dust Collector I.D.	PM and PM10 Emission Rate (lbs/hour)
DC1N	2.91
DC1S	2.91
DC2C	1.46
DC2N	2.91
DC2S	1.46
DC3	1.03
DC4	0.7
DC5	2.91
DC6	11.0
DC7	1.71
DC11	0.26
DC12	0.51
DC13	0.51
DC14	0.51
DC15	0.26
DC17	0.51
DC18	0.51
DC19	0.26
DC21	0.17

Compliance with these limitations makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the woodworking facilities and their control devices.

Compliance Determination Requirements

D.4.4 Particulate

(a) In order to comply with Condition D.4.1, the baghouses used for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking, grinding, and machining operations are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations [40 CFR 64]

(a) Daily visible emission notations of the woodworking stack exhausts for baghouses DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.4.6 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process WW1 at least once per week when the woodworking processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across any baghouse is outside the normal range of one (1) to five (5) inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside this range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.4.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

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

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

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the woodworking, grinding, and machining stack exhausts associated with WW1. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).

(b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:

(1) Weekly records of the pressure drop.

(2) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

(a) A petroleum fuel, other than gasoline, dispensing facility, each having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day [326 IAC 8-9], including:

(1) One (1) 500 gallon storage tank (identified as Tank 9) constructed in 2000.

(2) Two (2) 1,000 gallon storage tanks (identified as Tanks 1 and 2) constructed in 1992.

(3) One (1) 1,000 gallon storage tank (identified as Tank 15B) constructed in 2000.

(4) Ten (10) 1,000 gallon storage tanks (identified as Tank 3 through Tank 8, Tank 10 through Tank 12, and Tank 15A) constructed in 2001.

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-9]

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the Permittee of a stationary vessel with a capacity of less than thirty-nine thousand (39,000) gallons, and which is not exempt, shall maintain a record and submit to the department a report containing the following information for each vessel:

(a) The vessel identification number.

(b) The vessel dimensions.

(c) The vessel capacity.

The Permittee shall keep all records as described for the life of the vessel. All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

(b) Propane or liquid petroleum gas, or butane-fired combustion units with heat input of equal to or less than six million (6,000,000) Btu per hour [326 IAC 6-1-2(b)], including:

(1) One (1) propane boiler, with a maximum heat input capacity of 2 MMBtu per hour.

(2) One (1) propane oven, with a maximum heat input capacity of 0.66 MMBtu per hour.

(e) One (1) emergency generator with a maximum heat input capacity of 5.7 MMBtu per hour. [326 IAC 6.5-1-2(a).

(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 2-7-5(1)]

D.6.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

(a) Pursuant to 326 IAC 6.5-1-2(b)(formerly 326 IAC 6-1-2(b)(2)), the particulate matter emissions from the propane-fired boilers shall be limited to 0.15 pounds per million Btu.

(b) Pursuant to 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(b), the particulate emissions from the emergency generator shall be limited to 0.03 grain per dry standard cubic foot.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

(d) Emission units and activities whose potential uncontrolled emissions equal to or less than 0.6 ton per year of lead (3.29 pounds per day), 5 pounds per hour of sulfur dioxide (25 pounds per day), 5 pounds per hour of nitrogen oxides (25 pounds per day), 25 pounds per day of carbon monoxide, 5 pounds per hour of PM_{10} (25 pounds per day), 3 pounds per hour of volatile organic compounds (15 pounds per day), including:

(1) Sawdust handling and storage with maximum throughput capacity of 361 pounds of sawdust per hour. [326 IAC 6-1-2(a)]

(2) Truck loading with a maximum throughput capacity of 5,192 pounds of waste per hour. [326 IAC 6-1-2(a)]

(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 2-7-5(1)]

D.7.1 Particulate Matter [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a)(formerly 326 IAC 6-1-2(a)), particulate matter emissions from the insignificant sawdust handling and loading operations shall be limited to 0.03 grain per dry standard cubic foot.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, Indiana 47106
Mailing Address: 533 Louis Smith Road, Borden, Indiana 47106
Part 70 Permit No.: T019-15610-00079

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, Indiana 47106
Mailing Address: 533 Louis Smith Road, Borden, Indiana 47106
Part 70 Permit No.: T019-15610-00079

This form consists of 2 pages **Page 1 of 2**

☐ 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 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **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
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, 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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, Indiana 47106
Mailing Address: 533 Louis Smith Road, Borden, Indiana 47106
Part 70 Permit No.: T019-15610-00079

Months: _____ **to** _____ **Year:** _____

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Koetter Woodworking, Inc.
Source Location:	533 Louis Smith Road, Borden, Indiana 47106
County:	Clark
SIC Code:	2426
Operation Permit No.:	T019-15610-00079
Permit Reviewer:	ERG/SE

On March 2, 2007, the Office of Air Quality (OAQ) had a notice published in the Evening News, Clark County, Indiana, stating that Koetter Woodworking had applied for a Part 70 Operating Permit Renewal to operate a saw and millwork facility and wood molding production plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 13, 2007 and March 16, 2007, Koetter Woodworking, Inc. submitted comments on the proposed Part 70 Renewal. Deleted language appears as ~~strikethrough~~ and new language appears in **bold**. The summary of the comments is as follows:

Comment #1:
Koetter Woodworking, Inc. requests the description of boiler EU-01C be changed from wood/paper-fired to wood-fired only and to remove Condition D.2.4 from the permit. Koetter Woodworking, Inc. also requests the description of boiler EU-01B be changed from wood-fired to wood/paper-fired. Koetter Woodworking, Inc. states that the change is being made because boiler EU-01B is a smaller boiler than EU-01C and would have less of an impact on emissions.

Response to Comment #1:
There are no AP-42 emission factors available for combustion of paper in boilers. Therefore, the potential emission calculations presented in the Technical Support Document (TSD) to the permit are based on AP-42, Chapter 1.6 (Wood Residue Combustion in Boilers) for both boilers EU-01B and EU-01C, and the calculated potential to emit will not change as a result of the revised descriptions. This change does not affect the applicability of any state or federal rules.

Condition D.2.4 was included in the permit as a special condition to limit the types of paper material combusted in EU-01C in order to prevent an increase in the potential to emit VOC or HAPs due to the possible combustion of contaminants on paper. This condition has been removed from Section D.2 of the permit and has been incorporated into Section D.1 as Condition D.1.2 for boiler EU-01B. The permit has been revised as follows.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

. . .

(b) One (1) ~~wood-fired~~ **wood/paper-fired** boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without control. Emissions are exhausted through stack S-1.

(c) One (1) ~~wood/paper-fired~~ **wood-fired** boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

. . .

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

. . .

(b) One (1) ~~wood-fired~~ **wood/paper-fired** boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without controls. Emissions are exhausted through stack S-1.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(c) One (1) ~~wood/paper-fired~~ **wood-fired** boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

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

D.1.2 Special Conditions

The Permittee shall use only clean paper, including shredded currency, which is not contaminated with other types of waste as a supplemental fuel for the 2.5 MMBtu per hour boiler identified as EU-01B.

~~D.2.4 Special Conditions~~

~~Pursuant to Amendment 019-8585-00079 (issued July 15, 1997) to CP019-4924-00079 (issued April 8, 1997), the Permittee shall use only clean paper, including shredded currency, that is not contaminated with other types of waste as a supplemental fuel for the 29.9 MMBtu per hour boiler.~~

Comment #2
Koetter Woodworking, Inc. requests the source contact be changed to the following:

John W. McClure, Director
Environmental Health & Safety
Koetter Woodworking, Inc.
533 Louis Smith Rd.
Borden, Indiana 47106
812-923-4575 - Office
812-923-6630 - Fax
812-404-6007 - Cell

Response to Comment #2:
IDEM, OAQ has updated the contact information for this source. The name will be kept up-to-date in IDEM's permit tracking system. The general source phone number in Condition A.1 has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary saw and millwork facility and wood molding production plant.

Source Address:	533 Louis Smith Road, Borden, Indiana 47106
Mailing Address:	533 Louis Smith Road, Borden, Indiana 47106
General Source Phone Number:	~~(810) 923-6611~~ **812-923-4575**

. . .

Comment #3:
Condition D.4.6 requires the Permittee to record the pressure drop across the baghouse used in conjunction with the woodworking process WW1 at least once per day when the woodworking process is in operation when venting to the atmosphere. In order to show compliance with Condition D.4.6, Condition D.4.8 requires the Permittee to maintain weekly records of the pressure drop. Koetter Woodworking, Inc. requests the requirement in Condition D.4.6 be changed from daily recordings to weekly recordings to match Condition D.4.8.

Response to Comment #3:
IDEM agrees. The following changes have been made to the permit:

D.4.6 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process WW1 at least once per ~~day~~ **week** when the woodworking processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across any baghouse is outside the normal range of one (1) to five (5) inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside this range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. In order to clarify that the intent of the visible emissions notations recordkeeping is for the Permittee to make a record every day, Conditions D.1.4, D.2.9, and D.4.8 have been revised as follows. If the Permittee does not do a visible emission observation, the Permittee should still make a record that day as to why there was no visible emission observation, such as the unit was not operating.

~~D.1.4~~ **D.1.5** Record Keeping Requirements

(a) To document compliance with Condition ~~D.1.3~~ **D.1.4**, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts once per day. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).**

~~D.2.9~~ **D.2.8** Record Keeping Requirements

(a) To document compliance with Condition ~~D.2.7~~ **D.2.6**, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per day. **The Permittee shall include in its daily record when a visible emission notation is not taken and**

the reason for the lack of visible emission notation, (e.g., the process did not operate that day).

. . .

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the woodworking, grinding, and machining stack exhausts associated with WW1. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).**

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4. IDEM, OAQ has also decided to add the specific mail codes (MC) for each of the IDEM branches to improve mail delivery, as follows:

Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Koetter Woodworking, Inc.
Source Location:	533 Louis Smith Road, Borden, Indiana 47106
County:	Clark
SIC Code:	2426
Operation Permit No.:	T019-7067-00079
Operation Permit Issuance Date:	November 12, 1998
Permit Renewal No.:	T019-15610-00079
Permit Reviewer:	ERG/SE

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Koetter Woodworking, Inc. relating to the operation of a saw and millwork facility and wood molding production plant.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) wood-fired boiler (identified as unit EU-01A), constructed in 1979, with a maximum heat input of 1.8 MMBtu per hour without control. Emissions are exhausted through stack S-1.

(b) One (1) wood-fired boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without control. Emissions are exhausted through stack S-1.

(c) One (1) wood/paper-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

(d) One (1) vacuum coating system (identified as unit EU-02), constructed in 1996, with a maximum throughput rate of 12,000 linear feet of wood molding per hour, using a flow-coating application method.

(e) Woodworking operations (identified as WW1), constructed in the 1960s and modified in 1996, with a maximum process rate of 31,047 pounds of wood per hour. Particulate matter emissions are controlled by ten (10) baghouses (identified as DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7).

(f) Mill and saw-work activities, constructed in the 1960s, including:

(1) Lumber processing conducted in building No. 2, with a maximum throughput capacity of 17,308 pounds of lumber per hour.

(2) Waste lumber processing conducted in building No. 2, with a maximum throughput capacity of 1,731 pounds per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) A petroleum fuel, other than gasoline, dispensing facility, each having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day [326 IAC 8-9], including:

(1) One (1) 500 gallon storage tank (identified as Tank 9) constructed in 2000.

(2) Two (2) 1,000 gallon storage tanks (identified as Tanks 1 and 2) constructed in 1992.

(3) One (1) 1,000 gallon storage tank (identified as Tank 15B) constructed in 2000.

(4) Ten (10) 1,000 gallon storage tanks (identified as Tank 3 through Tank 8, Tank 10 through Tank 12, and Tank 15A) constructed in 2001.

(b) Propane or liquid petroleum gas, or butane-fired combustion units with heat input of equal to or less than six million (6,000,000) Btu per hour [326 IAC 6.5-1-2(6)], including:

(1) One (1) propane boiler, with a maximum heat input capacity of 2 MMBtu per hour.

(2) One (1) propane oven, with a maximum heat input capacity of 0.66 MMBtu per hour.

(c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21. [326 IAC 6.5-1-2(a)]

(d) Emission units and activities whose potential uncontrolled emissions equal to or less than 0.6 ton per year of lead (3.29 pounds per day), 5 pounds per hour of sulfur dioxide (25 pounds per day), 5 pounds per hour of nitrogen oxides (25 pounds per day), 25 pounds per day of carbon monoxide, 5 pounds per hour of PM10(25 pounds per day), 3 pounds per hour of volatile organic compounds (15 pounds per day), including:

(1) Sawdust handling and storage with maximum throughput capacity of 361 pounds of sawdust per hour. [326 IAC 6.5-1-2(a)]

(2) Truck loading with a maximum throughput capacity of 5,192 pounds of waste per hour. [326 IAC 6.5-1-2(a)]

(e) One (1) emergency generator with a maximum heat input capacity of 5.7 MMBtu per hour. [326 IAC 6.5-1-2(a)]

Existing Approvals

The source has been operating under Operating Permit T019-7067-00079, issued on November 12, 1998, and the following approvals:

(a) Reopening 019-13169-00079, issued on October 19, 2001; and

(b) Administrative Amendment 019-18951-00079, issued on April 28, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit.

(a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

(b) T019-7067-00079, issued on November 12, 1998.

Condition D.1.1: Pursuant to 326 IAC 6-2-3(e), the particulate matter emissions from the 1.8 MMBtu per hour boiler, EU-01A, and the 2.5 MMBtu per hour boiler, EU-01B, shall each be limited to 0.6 pounds per MMBtu heat input.

Condition D.2.1: The PM emissions from the 29.9 MMBtu per hour boiler, EU-01C, shall not exceed 0.41 pounds per MMBtu heat input.

Condition D.6.1: Pursuant to 326 IAC 6-2-3(e), the PM emissions from the ten (10) propane boilers shall not exceed 0.6 pounds per MMBtu heat input.

Reason not incorporated: These units are subject to the requirements of 326 IAC 6.5-1-2(b) (formerly 326 IAC 6-1-2(b)) because this source is located in Clark County, has potential PM emissions greater than 100 tons per year, and actual emissions greater than 10 tons per year. Based on 326 IAC 6-2-1(e), emission units subject to 326 IAC 6-1 are not subject to the provisions of 326 IAC 6-2. 326 IAC 6-1 is still in affect under 40 CFR 52, Subpart P.

(c) T019-7067-00079, issued on November 12, 1998.

Condition D.3.1: Pursuant to 326 IAC 6-3-2, the PM emissions from the vacuum coating system shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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:

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

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

Reason not incorporated: The vacuum coating system is not subject to the requirements of 326 IAC 6.5-1-2(a) or 326 IAC 6-3-2(d), because the coating system uses a dip-and-drain surface coating method with 100% transfer efficiency and has no particulate emissions.

(d) T019-7067-00079, issued on November 12, 1998.

Condition D.4.1: (a) Pursuant to 326 IAC 6-3-2(c) (Process Operations), the particulate matter emission rates from the woodworking operation (WW1) shall not exceed the following allowables in pounds per hour:

Collector	Process Weight Rate lbs/hr	Allowable lbs/hr
DC1N	2914	5.28
DC1S	2914	5.28
DC2C	1460	3.32
DC2N	2914	5.28
DC2S	1460	3.32
DC3	1030	2.63
DC4	700	2.03
DC5	2914	5.28
DC6	10971	12.83
DC10	1710	3.69
DC16	1030	2.63
DC20	1030	2.63

These woodworking facilities shall not exceed their listed pounds per hour allowables when operating at the specified process weight.

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter emission rates from the Millwork and sawwork operations, shall not exceed 18.6 pounds per hour.

The pounds per hour limitation for woodworking operation WW1 and the Millwork and Sawwork operations were calculated as follows:

Interpolation and extrapolation 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:

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

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

Reason not incorporated: These units are subject to the requirements of 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)) because this source is located in Clark County, has potential PM emissions greater than 100 tons per year, and actual emissions greater than 10 tons per year. Based on 326 IAC 6-3-1(c)(3), emission units that are subject to 326 IAC 6-1 are not subject to the provisions of 326 IAC 6-3. 326 IAC 6-1 is still in effect under 40 CFR 52, Subpart P.

(e) T019-7067-00079, issued on November 12, 1998.

Condition D.5.1: Pursuant to 326 IAC 6-3-2, the PM emissions from the woodworking operations, identified as WW2, based on a process weight rate of 5,000 pounds per hour, shall not exceed 7.58 pounds per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation 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:

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

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

Reason not incorporated: These units are subject to the requirements of 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)) because the source is located in Clark County, has

potential PM emissions greater than 100 tons per year, and actual emissions greater than 10 tons per year. Based on 326 IAC 6-3-1(c)(3), emission units that are subject to 326 IAC 6-1 are not subject to the provisions of 326 IAC 6-3. Pursuant to 40 CFR 52, Subpart P, 326 IAC 6-1 is still in effect.

(f) T019-7067-00079, issued on November 12, 1998.

Condition D.6.2: Pursuant to 326 IAC 6-3-2, the PM emission rate from the debarking, sawing, and sawdust pile handling operations shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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:

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

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

Reason not incorporated: These operations are subject to the requirements of 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)) because the source is located in Clark County, has potential PM emissions greater than 100 tons per year, and actual emissions greater than 10 tons per year. Based on 326 IAC 6-3-1(c)(3), emission units that are subject to 326 IAC 6-1 are not subject to the provisions of 326 IAC 6-3. 326 IAC 6-1 is still in effect under 40 CFR 52, Subpart P.

(g) T019-7067-00079, issued on November 12, 1998.

Condition D.3.3: Pursuant to CP-019-5669 issued June 13, 1996, and 326 IAC 2-1, any change or modification which may increase the potential VOC emissions to 25 tons per year or more from this facility must be approved by IDEM, OAQ before such change may occur.

Reason not incorporated: This condition is not included in the draft Part 70 permit renewal because the potential to emit VOC for the surface coating facility is less than 25 tons per year and this limit is not required by 326 IAC 2-2, 326 IAC 2-3, or any Article 8 rule.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal 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 Part 70 permit renewal application for the purposes of this review was received on May 9, 2002.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 8)

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	>250
PM-10	>250
SO_2	3.99
VOC	24.3
CO	90.3
NO_x	75.9

HAPs	Unrestricted Potential Emissions (tons/yr)
Total HAPs	4.66

The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7.

Potential To Emit

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."

The source was issued a Part 70 Operating Permit on November 12, 1998. 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 original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Boiler EU-IA	3.2	2.8	0.2	0.1	4.7	3.9	0.25
Boiler EU-IB	4.4	3.9	0.3	0.2	6.6	5.4	0.34
Boiler EU-IC	18.3	16.5	3.3	2.2	78.6	64.2	4.07
Woodworking Operations (WWI)	127	127	0	0	0	0	0
Mill and Saw work Operations	20.9	12.1	0	0	0	0	0
Surface Coating	0	0	0	21.7	0	0	0
Insignificant Activities	15.5	15.5	0.19	0.06	0.40	2.35	0
Total PTE	189	178	3.99	24.3	90.3	75.9	4.7

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is equal to or greater than 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	Not Reported
SO_2	Not Reported
VOC	19
CO	Not Reported
NO_x	Not Reported
HAP	Not Reported

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset.

(b) Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.

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

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for Boilers EU-01A, EU-01B, PB2, PB4, PB5, PB7 and PB9 through PB14. These boilers have heat input capacities less than 10 MMBtu per hour.

Boiler EU-01C is subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because the boiler was constructed after June 9, 1989 and has maximum heat input capacity greater than 10 MMBtu/hr and less than 100 MMBtu/hr. This boiler is not subject to the requirements of 40 CFR 60.42c (Standards for Sulfur Dioxide) because no coal or oil are combusted in this boiler. This boiler is also not subject to the requirements in 40 CFR 60.43c (Standards for Particulate Matter). The PM standard in 40 CFR 60.43c(a) is not applicable because this boiler does not burn coal and has a heat input capacity of less than 30 MMBtu per hour. The PM standard in 40 CFR 60.43c(b) and the opacity standard in 40 CFR 60.43c(c) do not apply to this boiler because its heat input capacity is less than 30 MMBtu per hour. Since the boiler does not burn fuel oil or coal, it is subject only to the record keeping and reporting requirements in 40 CFR 60.48c. Under this rule, the source is required to maintain monthly records of the amount and type of fuel burned.

There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit. The boiler EU-01C, which is fired using wood and paper, is not subject to the NSPS 40 CFR 60, Subpart E - Standards of Performance for Incinerators (326 IAC 12) because the paper used to fuel the unit does not meet the definition of solid waste. Solid waste is defined in this NSPS as refuse containing more than 50% municipal type waste consisting of a mixture of paper, wood, yard wastes, food wastes, plastics, leather, rubber, and other combustibles, and noncombustible materials such as glass and rock. The source is specifically required to burn only clean paper that is not potentially contaminated with other types of wastes (see Condition D.2.4).

(b) The New Source Performance Standards (NSPS), 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 are not included in this permit for storage tanks 1 through 11. Storage Tanks 1 through 11 have storage capacities less than 19,813 gallons (75 cubic meters). The requirements of 40 CFR 60, Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978) and 40 CFR 60, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984), are not included in this permit. Tank 1 has a storage capacity less than 40,000 gallons. Storage Tanks 2 through 11 were all constructed after the applicability dates of these rules.

(c) The National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (NESHAPs) (326 IAC 20 and 40 CFR 63, Subpart JJ) are not included in this permit for the surface coating operation EU-02. This source does not meet the definition of a major source as defined in 40 CFR 63, Subpart A, Section 63.2.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in this permit for the three (3) wood-fired boilers and ten

(10) propane-fired boilers. This source does not meet the definition of a major source as defined in 40 CFR 63, Subpart A, Section 63.2.

(e) The requirements of 40 CFR 63, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) are not included in this permit. This source is not a major source of hazardous air pollutants.

(f) The requirements of 40 CFR 63, Subpart DDDD (National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products) are not included in this permit. This source is not a major source of hazardous air pollutants.

(g) The requirements of 40 CFR 63, Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products (326 IAC 20-79) are not included in this permit. This source is not a major source of hazardous air pollutants.

(h) This source is subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has the potential to emit, of the applicable regulated air pollutant, equal to or greater than 100 percent of the amount required for a source to be classified as a major source.

The woodworking operations (WW1) are subject to 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)), which establishes particulate matter limitations. Baghouses are used to comply with this limitation and the uncontrolled PM10 emissions are greater than 100 tons per year. Therefore, the woodworking operations are subject to the CAM rules since the regulated pollutant under 326 IAC 6.5-1-2(a) is particulate matter, which is a surrogate for PM10. To comply with the requirements of the CAM rules, the source will monitor the stack exhausts from the baghouses DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7 daily for visible emissions and will maintain the pressure drop across each baghouse between 2.0 and 5.0 inches of water. The baghouse pressure drop will be checked at least once per day to ensure the baghouse is operating correctly.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Koetter Woodworking, Inc. is located in Wood Township in Clark County and is therefore subject to the 40% average opacity limit in 326 IAC 5-1-2.

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

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)

This source is not one of the twenty-eight source categories and does not belong to a stationary source category that as of August 7, 1980 is regulated under Section 111 or 112 of the Clean Air Act. Therefore, fugitive emissions of VOC and PM are not counted toward applicability of 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offset).

This source was initially constructed in the 1960s and at the time the PSD and Emission Offset rules were promulgated, this source is believed to have been an existing major source under PSD (PTE for particulate matter greater than 250 tons) and an existing minor source under Emission Offset (PTE for VOC and NOx less than 100 tons per year). The source was modified in 1979, 1982, 1988, 1992, and 1996. The 1979 modification consisted of the construction of the 1.8 MMBtu per hour, wood-fired boiler (EU-01A). The increase in emissions of particulate, sulfur dioxide, nitrogen dioxides, VOC, and carbon monoxide were all less than 5 tons per year. Consequently, this modification did not trigger PSD or Emission Offset review.

In 1982, the source installed the 2.5 MMBtu per hour, wood-fired boiler (EU-01B). The increase in emissions of particulate, sulfur dioxide, nitrogen dioxides, VOC, and carbon monoxide were all less than 7 tons per year. Consequently, this modification did not trigger PSD or Emission Offset review.

In 1988 and 1992, the source added several small storage tanks. Seven 1,000 gallon storage tanks were installed in 1988 and another two 1,000 gallon tanks were added in 1992. The potential VOC emissions from these tanks are negligible. Therefore, the 1988 and 1992 modifications did not trigger PSD or Emission Offset review.

In 1996, the source installed the 29.9 MMBtu per hour boiler, the vacuum coating system, and some insignificant emission units (e.g., additional woodworking equipment with baghouses and a 1,000 gallon storage tank). The increases in VOC and NOx emissions were approximately 51 tons per year and 64 tons per year, respectively. Since these increases are both less than 100 tons per year and the source was an existing minor source under Emission Offset prior to the 1996 modification, this modification was not subject to the requirements of 326 IAC 2-3 (Emission Offset) (see note 1). The increases in PM and PM-10 emissions were greater than the PSD thresholds of 25 tons per year and 15 tons per year, respectively. Although the source was technically a major source for PSD prior to the 1996 modification primarily due to the particulate emissions from the woodworking operations, the source used baghouses to control the emissions from the woodworking operations. Consequently, the actual particulate emissions from the woodworking operations were less than 35 tons per year after the 1996 modification. However, in order to make PSD not applicable to the 1996 modification, the source must comply with the following PM and PM10 emission limitations:

The PM and PM10 emissions from the woodworking operations, identified as WW1, and the insignificant grinding and machining operations shall be limited by the following:

Dust Collector I.D.	PM and PM10 Emission Rate (lbs/hour)
DC1N	2.91
DC1S	2.91
DC2C	1.46
DC2N	2.91
DC2S	1.46
DC3	1.03
DC4	0.7
DC5	2.91
DC6	11.0
DC7	1.71
DC11	0.26

Dust Collector I.D.	PM and PM10 Emission Rate (lbs/hour)
DC12	0.51
DC13	0.51
DC14	0.51
DC15	0.26
DC17	0.51
DC18	0.51
DC19	0.26
DC21	0.17
Total	32.5

Note: These emission rates were determined based on the potential to emit after the control device and using a control efficiency of 99.9%.

Compliance with these limitations makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

In 2000, two new storage tanks were constructed with capacities of 500 gallons and 1,000 gallons. In 2001, an additional ten 1,000 gallon storage tanks were constructed. Since these tanks are used to store petroleum fuel, the increase in VOC emissions from these tanks was negligible and did not trigger 326 IAC 2-2 or 326 IAC 2-3. The above PM and PM10 emission limits make this source minor under PSD since the PTE for all other regulated pollutants are less than 250 tons per year.

On June 15, 2004, the U.S. EPA designated Clark County as nonattainment for the 8-hour ozone standard. The PTE for VOC and NOx are each less than 100 tons per year. On January 5, 2005, the U.S. EPA designated Clark County as nonattainment for the PM2.5 standard. As previously in this document, the U.S. EPA has directed states to use PM10 emissions as a surrogate for PM2.5 until specific New Source Review rules are adopted for PM2.5. Since the potential to emit PM10 is greater than 100 tons per year, this source is a major Source under the nonattainment area New Source Review for any future modifications.

[Note 1: Clark County was not re-designated by U.S.EPA as maintenance attainment for the 1-hour ozone standard until October 23, 2001.]

326 IAC 2-4.1 (New Source Toxics Controls)

The requirements of 326 IAC 2-4.1 are not applicable to this source because no major sources of hazardous air pollutants were constructed or reconstructed at this source after July 27, 1997.

326 IAC 6.5-1 (Particulate Matter Limitations)

This source is subject to the requirements of 326 IAC 6.5-1-2 (formerly 326 IAC 6-1-2) because it has potential PM emissions greater than 100 tons per year, actual PM emissions greater than 10 tons per year, and is not one of the sources listed in 326 IAC 6.5-2 (Clark County).

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Operations)

This source is not subject to the requirements of 326 IAC 6-3 because pursuant to 326 IAC 6-3-1(c)(3) emission units that are subject to 326 IAC 6-1 are exempt from the requirements of 326 IAC 6-3. Note that 326 IAC 6-1 is still in effect under 40 CFR 52, Subpart P.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is located in Wood Township in Clark County and was constructed prior to December 13, 1985 and has not constructed any new sources of fugitive particulate matter after that date.

State Rule Applicability - Boilers EU-01A and EU-01B

326 IAC 6.5-1-2(b) (Particulate Matter Limitation)

The vacuum coating system is not subject to the requirements of 326 IAC 6.5-1-2(a), because the coating system uses a dip-and-drain surface coating method with 100% transfer efficiency and has no particulate emissions.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The 1.8 MMBtu per hour boiler EU-01A and the 2.5 MMBtu per hour boiler EU-01B are not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each boiler is less than twenty-five (25) tons per year.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Boiler EU-01A is not subject to the requirements of 326 IAC 8-1-6 because it was constructed prior to January 1, 1980. Although constructed after January 1,1980, Boiler EU-01B is not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions from this unit are less than 25 tons per year.

State Rule Applicability - Boiler EU-01C

326 IAC 6.5-1-2(b) (Particulate Matter Limitation)

The vacuum coating system is not subject to the requirements of 326 IAC 6.5-1-2(a), because the coating system uses a dip-and-drain surface coating method with 100% transfer efficiency and has no particulate emissions.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The 29.9 MMBtu per hour boiler EU-01C is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year.

326 IAC 12 (New Source Performance Standards)

Boiler EU-01C is subject to the recordkeeping requirements of 326 IAC 12 because it has a heat input capacity greater than 10 MMBtu per hour but less than 100 MMBtu per hour, was approved for construction after June 9, 1989, and is defined as a "steam generating unit" pursuant to 40 CFR 60.41c. Pursuant to this rule, the Permittee shall keep daily records of the fuel burned in the boilers. 326 IAC 12 incorporates by reference a version of 40 CFR 60, Subpart Dc that predates the revisions made to 40 CFR 60, Subpart Dc on February 27, 2006.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Although constructed after January 1, 1980, Boiler EU-01C is not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions are less than 25 tons per year.

Special Condition

Pursuant to Amendment 019-8585-00079 (issued July 15, 1997) to CP019-4924-00079 (issued April 8, 1997), the Permittee shall use only clean paper, including shredded currency, that is not contaminated with other types of waste, as a supplemental fuel for the 29.9 MMBtu per hour boiler.

State Rule Applicability - Surface Coating Operation (EU-02)

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating

Brush or Wipe Application
Dip-and-Drain Application

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

The flow-coating application method used by the source is considered equivalent to the dip-and-drain application method listed in 326 IAC 8-2-12. Therefore, the source is in compliance with this rule.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Although constructed after January 1, 1980, the vacuum coating system is not subject to the requirements of 326 IAC 8-1-6 because it is subject to 326 IAC 8-2-12.

326 IAC 6.5-1-2(a) (Particulate Matter Limitations)

The vacuum coating system is not subject to the requirements of 326 IAC 6.5-1-2(a), because the coating system uses a dip-and-drain surface coating method with 100% transfer efficiency and has no particulate emissions.

State Rule Applicability - Woodworking Operations (WW1)

326 IAC 6.5-1-2(a) (Particulate Matter Limitations)

(a) Pursuant to 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)), the particulate emissions from the woodworking, mill, and saw-work operations shall not exceed 0.03 grains per dry standard cubic foot.

In order to comply with this limit, the source will use baghouses for PM control and they shall be in operation at all times the woodworking facility WW1 is in operation. These woodworking operations do not meet the definition of insignificant activity as defined in 326 IAC 2-7-1(21)(G)(xxix) or (xxx) because the outlet grain loading from each baghouse is 0.02 gr/dscf.

State Rule Applicability - Insignificant Propane-Fired Boilers

326 IAC 6.5-1-2(b) (Particulate Matter Limitation)

Pursuant to 326 IAC 6.5-1-2(b)(2)(formerly 326 IAC 6-1-2(b)) the particulate matter emissions from the propane-fired boilers shall be limited to 0.15 pounds per million Btu.

Based on the AP-42 emission factor, the PM emissions from the propane-fired boilers is 6.4×10^{-3} pounds per MMBtu. The propane-fired boilers are, therefore, in compliance with 326 IAC 6.5-1-2(b)(2). No compliance monitoring or preventive maintenance plan are required for these emission units because there are no control devices and the actual emissions of PM, SO_2, and VOC are very low.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The propane boilers are not subject to the requirements of 326 IAC 8-1-6 because they have potential VOC emissions that are less than 25 tons per year.

State Rule Applicability - Insignificant Storage Tanks

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tank located at this source are subject to the requirements of 326 IAC 8-9 because the source is located in Clark County. Since the storage tanks have capacities less than 39,000 gallons, the source is subject only to the reporting and record keeping provisions of 326 IAC 8-9-6(a) and is exempt from all other provisions of this rule. As required by 326 IAC 8-9-6(a), the

source shall maintain a record and submit to the department a report containing the following information on each vessel:

(a) The identification number for each vessel.

(b) The dimensions of each vessel.

(c) The storage capacity of each vessel.

The Permittee shall keep all records as described above for the life of the storage vessel.

State Rule Applicability - Other Insignificant Activities Including Machining, Grinding, Woodworking, Sawdust Handling, and Loading Operations

326 IAC 6.5-1-2(a) (Particulate Matter Limitations)

Pursuant to 326 IAC 6.5-1-2(a)(formerly 326 IAC 6-1-2(a)), particulate matter (PM) emissions from the insignificant grinding, machining, woodworking, log debarking, sawdust handling, and loading operations shall be limited to 0.03 grain per dry standard cubic foot.

No compliance monitoring or preventive maintenance plan are required for the insignificant grinding, machining, and woodworking operations because these units are controlled by baghouses and the potential to emit after the control device is very low. No compliance monitoring or preventive maintenance plan are required for the log debarking, sawdust handling, and loading operations because there are no control devices and the combined PM emissions from all these activities is also low.

State Rule Applicability - Emergency Generator

326 IAC 6.5-1-2(a) (Particulate Matter Limitations)

Pursuant to 326 IAC 6.5-1-2(a)(formerly 326 IAC 6-1-2(a)), the particulate matter emissions from the emergency generator shall be limited to 0.03 grains per dry standard cubic foot.

Testing Requirements

Testing is not required for the woodworking operations because the source will regularly monitor the baghouses to ensure they are operating correctly.

Note: No stack tests were required in their current Part 70 permit (T019-7067-00079, issued November 12, 1998).

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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 in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The boilers EU-01A and EU-01B have applicable compliance monitoring conditions as specified below:

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

   These monitoring conditions are necessary to ensure compliance with 326 IAC 6.5-1-2(b).

2. The boiler EU-01C has applicable compliance monitoring conditions as specified below:

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

   (b) 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. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions.

   These monitoring conditions are necessary because the cyclone must be maintained and operated properly to ensure compliance with 326 IAC 6.5-1-2(b).

3. The woodworking operations have applicable compliance monitoring conditions as specified below:

   (a) Daily visible emission notations of the woodworking stack exhausts for baghouses DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, DC10, DC16, and DC20 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken

during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across the baghouses DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, DC7 used in conjunction with woodworking process WW1, at least once per day when the woodworking process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across any baghouse is outside the normal range of one (1) to five (5) inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the range provided in the table below is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

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

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

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

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

These monitoring conditions are necessary because the baghouses must be maintained and operated properly to ensure compliance with 326 IAC 6.5-1-2(a) and 40 CFR 64 (CAM).

Conclusion

The operation of this sawwork, millwork, and wood molding production plant shall be subject to the conditions of this Part 70 Permit Renewal No. T019-15610-00079.

Appendix A: Emission Calculations
Woodworking Operations (WW1)

Company Name: Koetter Woodworking, Inc.
Address City IN Zip: 533 Louis Smith Road, Borden, IN 47106
Permit No. : 019-15610
Plt ID: 019-00079
Reviewer: ERG/SE
Date: 2-Jun-06

Baghouse ID	Air Flow Rate (acfm)	Throughput (lbs/hr)	Outlet Grain Loading (gr/acf)	PTE After Control (tons/yr)	Control Efficiency (%)	PTE Before Control (tons/yr)	PM Emissions after control (lbs/hr)
DC1N	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC1S	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC2C	8,500	1,460	0.02	6.38	99.9%	6,382	1.46
DC2N	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC2S	8,500	1,460	0.02	6.38	99.9%	6,382	1.46
DC3	6,000	1,030	0.02	4.51	99.9%	4,505	1.03
DC4	4,096	700	0.02	3.08	99.9%	3,076	0.70
DC5	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC6	64,000	10,971	0.02	48.1	99.9%	48,055	11.0
DC7	10,000	1,710	0.02	7.51	99.9%	7,509	1.71
Totals		28,987		127		126,967	29.0

Methodology:

PTE After Controls (tons/yr) = Air Flow (acfm) x outlet grain loading (gr/acf) x (1lb/7000 gr) x 60 min/hr x 8760 hrs/yr x (1 ton/2000lb)

PTE Before Controls (tons/yr) = PTE after controls (tons/yr) /(1 - control efficiency)

Appendix A: Emission Calculations
Insignificant Woodworking Operations

Company Name: Koetter Woodworking, Inc.
Address City IN Zip: 533 Louis Smith Road, Borden, IN 47106
Permit No. : 019-15610
Plt ID: 019-00079
Reviewer: ERG/SE
Date: 2-Jun-06

Baghouse ID	Air Flow Rate (acfm)	Throughput (lbs/hr)	Outlet Grain Loading (gr/acf)	PTE After Control (tons/yr)	Control Efficiency (%)	PTE Before Control (tons/yr)	PM Emissions after control (lbs/hr)
DC11	1,500	62.5	0.02	1.13	99.9%	1,126	0.26
DC12	3,000	625	0.02	2.25	99.9%	2,253	0.51
DC13	3,000	3,125	0.02	2.25	99.9%	2,253	0.51
DC14	3,000	3,125	0.02	2.25	99.9%	2,253	0.51
DC15	1,500	2,500	0.02	1.13	99.9%	1,126	0.26
DC17	3,000	500	0.02	2.25	99.9%	2,253	0.51
DC18	3,000	750	0.02	2.25	99.9%	2,253	0.51
DC19	1,500	375	0.02	1.13	99.9%	1,126	0.26
DC21	1,000	3.13	0.02	0.75	99.9%	751	0.17
Totals		11,066		15.4		15,393	3.51

Methodology:

PTE After Controls (tons/yr) = Air Flow (acfm) x outlet grain loading (gr/acf) x (1lb/7000 gr) x 60 min/hr x 8760 hrs/yr x (1 ton/2000lb)

PTE Before Controls (tons/yr) = PTE after controls (tons/yr) /(1 - control efficiency)

Appendix A: Emission Calculations
29.9 MMBtu/hr Wood-fired Boiler
Unit EU-1C

Company Name: Koetter Woodworking, Inc.
Address City IN Zip: 533 Louis Smith Road, Borden, IN 47106
Permit No. : 019-15610
Plt ID: 019-00079
Reviewer: ERG/SE
Date: 2-Jun-06

Heat Input Capacity
MMBtu/hr

29.9

	Pollutant												
	PM	PM10	PM2.5	SO2	NO_x	VOC	CO	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Manganese	Total HAP
Emission Factor in lb/MMBtu	0.4	0.36	0.31	0.025	0.49	0.017	0.6	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.6E-03	
Potential Emission in tons/yr	52.4	47.1	40.6	3.3	64.2	2.2	78.6	0.55	0.58	2.49	0.25	0.21	4.07

Methodology

Emission Factors from AP-42, Chapter 1.6 (Wood Residue Combustion in Boilers), Tables 1.6-1,1.6-2, and 1.6-3 (9/03)

Emission (tons/yr) = Heat input (MMBtu/hr) x 8760 hrs/yr x Emission Factor (lb/MMBtu)/2,000 lb/ton

Appendix A: Emission Calculations
2.5 MMBtu/hour Wood-fired Boiler
Unit EU-01B

Company Name: **Koetter Woodworking, Inc.**
Address City IN Zip: **533 Louis Smith Road, Borden, IN 47106**
Permit No. : **019-15610**
Plt ID: **019-00079**
Reviewer: **ERG/SE**
Date: **2-Jun-06**

Heat Input Capacity
MMBtu/hr

2.5

	Pollutant												
	PM	PM10	PM2.5	SO2	NO_x	VOC	CO	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Manganese	Total HAP
Emission Factor in lb/MMBtu	0.4	0.36	0.31	0.025	0.49	0.017	0.6	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.6E-03	
Potential Emission in tons/yr	4.4	3.9	3.4	0.3	5.4	0.2	6.6	0.05	0.05	0.21	0.02	0.02	0.34

Methodology
Emission Factors from AP-42, Chapter 1.6 (Wood Residue Combustion in Boilers), Tables 1.6-1, 1.6-2, and 1.6-3 (9/03)
Emission (tons/yr) = Heat input (MMBtu/hr) x 8760 hrs/yr x Emission Factor (lb/MMBtu)/2,000 lb/ton

Appendix A: Emission Calculations
1.8 MMBtu/hr Wood-fired Boiler
Unit EU-01A

Company Name: **Koetter Woodworking, Inc.**
Address City IN Zip: **533 Louis Smith Road, Borden, IN 47106**
Permit No. : **019-15610**
Plt ID: **019-00079**
Reviewer: **ERG/SE**
Date: **2-Jun-06**

Heat Input Capacity
MMBtu/hr

1.8

	Pollutant												
	PM	PM10	PM2.5	SO2	NO_x	VOC	CO	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Manganese	Total HAP
Emission Factor in lb/MMBtu	0.4	0.36	0.31	0.025	0.49	0.017	0.6	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.6E-03	
Potential Emission in tons/yr	3.2	2.8	2.4	0.2	3.9	0.1	4.7	0.03	0.03	0.15	0.01	0.01	0.25

Methodology

Emission Factors from AP-42, Chapter 1.6 (Wood Residue Combustion in Boilers), Tables 1.6-1, 1.6-2, and 1.6-3 (9/03)

Emission (tons/yr) = Heat input (MMBtu/hr) x 8760 hrs/yr x Emission Factor (lb/MMBtu)/2,000 lb/ton

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Koetter Woodworking, Inc.
Address City IN Zip: 533 Louis Smith Road, Bordem IN 47106
Permit No. : 019-15610
Plt ID: 019-00079
Reviewer: ERG/SE
Date: 2-Jun-06

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
W/B Primer	13.7	31.70%	30.7%	1.0%	50.7%	47.78%	0.00300	12000.000	0.28	0.14	4.95	119	21.7	0.0	0.29	100%

State Potential Emissions **4.95** **119** **21.7** **0.0**

*Surface Coating operation uses a dip and drain method with 100% transfer efficiency.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations

Insignificant Combustion Sources Fired Using Propane

(Includes the 2 MMBtu/hr Propane Boiler and the 0.66 MMBtu/hr Drying Oven)

Company Name: Koetter Woodworking, Inc.

Address City IN Zip: 533 Louis Smith Road, Borden, IN 47106

Permit No. : 019-15610

Plt ID: 019-00079

Reviewer: ERG/SE

Date: 2-Jun-06

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Sulfur content ***=	15.00 grains/100ft^3
2.66	247.89		

	Pollutant					
	PM*	PM10*	SO2	NO_x	VOC	CO
Emission Factor in lb/kgal	0.6	0.6	1.500 *(0.10 S)*	19.0	0.5 **TOC value	3.2
Potential Emission in tons/yr	0.07	0.07	0.186	2.35	0.06	0.40

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

*****Sulfur Content of Commercial Propane based on Gas Processors Association Engineering Data Book (Ninth Edition).**

Methodology

1 gallon of LPG has a heating value of 94,000 Btu (Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Appendix A: Emission Calculations

Saw and Millwork Operations

Company Name: Koetter Woodworking, Inc.

Address City IN Zip: 533 Louis Smith Road, Borden, IN 47106

Permit No. : 019-15610

Plt ID: 019-00079

Reviewer: ERG/SE

Date: 2-Jun-06

Operation	Throughput (lbs/hour)	Pollutant	Emission Factors (lbs/ton)	PTE (lbs/hr)	PM PTE (tons/yr)	Referrence for Emission Factor
Lumber Processing	17,308	PM	0.35	3.03	13.3	Fire 6.22, SCC 30700802
	17,308	PM-10	0.20	1.73	7.58	Fire 6.22, SCC 30700802
Waste Handling	1,731	PM	2.00	1.73	7.58	Fire 6.22, SCC 30703002
	1,731	PM-10	1.20	1.04	4.55	Fire 6.22, SCC 30703002
Total PM				4.76	20.85	
Total PM-10				2.77	12.13	

Methodology

PTE (lbs/hr) = Throughput (tons/hr) x Emission Factor (lbs/ton)

PTE (tons/yr) = PTE (lbs/hr) x 8760 hrs/yr x 1ton/2000 lbs