



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: October 11, 2007

RE: Indiana Veneer Products Division of Harris / 009-15894-00023

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT OFFICE OF AIR QUALITY

**Indiana Veneer Products Division of Harris-Tarkett, Inc.
890 West Huntington Street
Montpelier, Indiana 47359**

(herein known as the Permittee) is hereby authorized to construct and 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. 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.

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

Operation Permit No.: F009-15894-00023	
Issued by: Origin signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 11, 2007 Expiration Date: October 11, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary oak veneer floor manufacturing plant.

Source Address:	890 West Huntington Street, Montpelier, Indiana 47359
Mailing Address:	890 West Huntington Street, Montpelier, Indiana 47359
General Source Phone Number:	(765) 728-2438
SIC Code:	2435
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

Boilers

- (a) One (1) wood-fired boiler, identified as Unit ID #1, constructed in 1999, with a maximum heat input rate of 29.97 million British thermal units per hour, combusting wood chips and bark, utilizing a cyclone for particulate matter control, exhausting through one (1) stack, identified as S/V ID #1 used to provide heat for a veneer dryer and steam log warming.
- (b) One (1) natural gas-fired boiler, identified as Unit ID #2, constructed in 1999, with a maximum heat input rate of 10.47 million British thermal units per hour, used as a backup boiler, exhausting through one (1) stack, identified as S/V ID #2.

Surface Coatings

- (c) Two (2) surface coating booths, identified as Unit ID #13a and #13b, constructed in 1999, each with a maximum coating rate of 375 pounds of adhesive per hour, utilizing a rollcoating application system.

Woodworking

- (d) One woodworking operation, which consists of:
 - (1) One log sawing operation, constructed in 1999, with a maximum throughput of 15.3 tons/hr.
 - (2) One sawdust handling operation, constructed in 1999, with a maximum throughput of 0.03 tons/hr.

- (3) One log debarking operation, constructed in 1999, with a maximum throughput of 15.6 tons/hr.
- (4) One veneer chipper, constructed in 1999, with a throughput rate of 15.6 tons per hour.
- (5) One chip silo, constructed in 1999, with a maximum capacity of 8,064 cubic feet. Chips are pneumatically conveyed to the silo from the chipper through an integral product separator (cyclone).
- (6) One silo loadout operation, constructed in 1999, in which knuckle-sized wet wood chips with a moisture content greater than 60%, are loaded from the silo by front end loader and transported to the boilers with a maximum throughput of 2.93 tons/hr.

Veneer Dryer and Presses

- (e) One (1) veneer dryer, constructed in 1999, heated with steam from the wood-fired boiler, with a maximum throughput of 20,000 pounds per hour.
- (f) Four (4) veneer hot presses, constructed in 1999, with a total maximum throughput of 750 pounds per hour.

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

This stationary source also includes the following insignificant activities:

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) Closed loop heating and cooling systems.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (d) Heat exchanger cleaning and repair.
- (e) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and [326 IAC 2-8] when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

-
- (a) This permit, F009-15894-00023, 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, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability [326 IAC 2-8-6]

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

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

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

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

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

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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 2-8-4(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F009-15894-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.19 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, 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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

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

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

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

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

C.8 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall 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 2-8-4][326 IAC 2-8-5]

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

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Boilers

- (a) One (1) wood-fired boiler, identified as Unit ID #1, constructed in 1999, with a maximum heat input rate of 29.97 million British thermal units per hour, combusting wood chips and bark, utilizing a cyclone for particulate matter control, exhausting through one (1) stack, identified as S/V ID #1 used to provide heat for a veneer dryer and steam log warming.
- (b) One (1) natural gas-fired boiler, identified as Unit ID #2, constructed in 1999, with a maximum heat input rate of 10.47 million British thermal units per hour, used as a backup boiler, exhausting through one (1) stack, identified as S/V ID #2.

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

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

D.1.1 Particulate Emission Limitations [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations For Sources of Indirect Heating), the particulate emissions from the wood-fired boiler (Unit ID #1) and the natural gas-fired boiler (Unit ID #2) shall be limited to less than 0.42 pounds per million British thermal unit of heat input, each.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the wood-fired boiler and its control devices.

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

D.1.3 Visible Emissions Notations

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

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

D.1.4 Record Keeping Requirements [326 IAC 12]

- (a) Pursuant to 326 IAC 12, the Permittee shall maintain daily records of the amount and type of fuel combusted by the boiler. This condition expires when the transitions made to 40 CFR 60, Subpart Dc as amended on February 27, 2006, becomes an Indiana law. This condition is not federally enforceable.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of S/V ID #1 exhaust once per shift. 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 run that day).
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

D.1.5 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions for the one (1) wood-fired boiler (Unit ID#1) and the one (1) natural gas-fired boiler (Unit ID#2), except as otherwise specified in 40 CFR Part 60, Subpart Dc.
- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports 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

D.1.6 Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units Requirements [40 CFR Part 60, Subpart Dc]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which are incorporated by reference as 326 IAC 12, for the one (1) Cleaver Brooks firetube natural gas-fueled boiler as follows:

Subpart Dc-Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units

Source: 72 FR 32759, June 13, 2007, unless otherwise noted.

§ 60.40c Applicability and delegation of authority.

- (a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).
- (b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 71 FR 9884, Feb. 27, 2006; 72 FR 32759, June 13, 2007]

§ 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388 (incorporated by reference, see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Cogeneration steam generating unit means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (*i.e.* , the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Dry flue gas desulfurization technology means a SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline reagent and water, whether introduced separately or as a premixed slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO₂ control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 51.24.

Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means: (1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see §60.17).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO₂ emissions (nanograms per joule (ng/J) or lb/MMBtu heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Wet flue gas desulfurization technology means an SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of PM or SO₂.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 65 FR 61752, Oct. 17, 2000; 71 FR 9884, Feb. 27, 2006; 72 FR 32759, June 13, 2007]

§ 60.48c Reporting and recordkeeping requirements.

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in

§60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999; 65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006; 72 FR 32759, June 13, 2007]

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Surface Coating

- (c) Two (2) surface coating booths, identified as Unit ID #13a and #13b, constructed in 1999, each with a maximum coating rate of 375 pounds of adhesive per hour, utilizing a rollcoating application system.

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

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

D.2.1 Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following requirements:

- (a) The input of any single HAP to the surface coating operation (Unit ID #13a and #13b) shall be less than nine and three-tenths (9.3) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The input of any combination of HAPs to the surface coating operation (Unit ID #13a and #13b) shall be less than nineteen and four-tenths (19.4) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

These limits are structured such that, when HAP emissions from the boilers, presses, and dryer are included, the source total emissions of a single HAP remain less than ten (10) tons per year and the source total emissions of any combination of HAPs remain less than twenty-five (25) tons per year. Compliance with this limitation renders the requirements of 326 IAC 2-4.1 (Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.2.2 Volatile Organic Compounds (VOC) Limitation [326 IAC 8-1-6]

The VOC input to the surface coating operations (Unit ID #13a and #13b), combined, shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.2.1 and D.2.2.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Woodworking

- (d) One woodworking operation, which consists of:
- (1) One log sawing operation, constructed in 1999, with a maximum throughput of 15.3 tons/hr.
 - (2) One silo loadout operation, constructed in 1999, in which knuckle-sized wet wood chips with a moisture content greater than 60%, are collected from the silo hopper by loader and transported to the boilers with a maximum throughput of 2.93 tons/hr.
 - (3) One sawdust handling operation, constructed in 1999, with a maximum throughput of 0.03 tons/hr.
 - (4) One veneer chipper, with an integral cyclone collection device, constructed in 1999, with a throughput rate of 15.6 tons per hour, in which wood chips are pneumatically conveyed from the chipper to the cyclone, and separated into a storage silo.
 - (5) One log debarking operation, constructed in 1999, with a maximum throughput of 15.6 tons/hr.

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

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

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the log sawing operation shall not exceed 25.5 pounds per hour when operating at process weight rates of 15.3 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the veneer chipping operation shall not exceed 25.8 pounds per hour when operating at process weight rates of 15.6 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the silo loadout operation shall not exceed 8.4 pounds per hour when operating at process weight rates of 2.9 tons per hour.

These limitations in paragraph (a), (b), and (c) were calculated using the following equation:

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

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

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

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.3.3 Particulate Control

The integral cyclone shall be in operation and control emissions from the cyclone collection system at all times that these units are in operation.

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

D.3.4 Visible Emissions Notations

- (a) Visible emission notations of the woodworking operation 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) The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.3.5 Cyclone Inspections

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

D.3.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the woodworking exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not run that day).

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

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

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

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Address: 890 West Huntington Street, Montpelier, Indiana 47359
Mailing Address: 890 West Huntington Street, Montpelier, Indiana 47359
FESOP Permit No.: F009-15894-00023

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Address: 890 West Huntington Street, Montpelier, Indiana 47359
Mailing Address: 890 West Huntington Street, Montpelier, Indiana 47359
FESOP Permit No.: F009-15894-00023

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 Describe:
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**

FESOP Quarterly Report

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Address: 890 West Huntington Street, Montpelier, Indiana 47359
Mailing Address: 890 West Huntington Street, Montpelier, Indiana 47359
FESOP No.: F009-15894-00023
Facility: Surface coating operation (Unit ID #13a and #13b)
Parameter: HAP Input
Limit: The input of any single HAP to the surface coating operation (Unit ID #13a and #13b) shall be less than nine and three-tenths (9.3) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Address: 890 West Huntington Street, Montpelier, Indiana 47359
Mailing Address: 890 West Huntington Street, Montpelier, Indiana 47359
FESOP No.: F009-15894-00023
Facility: Surface coating operation (Unit ID #13a and #13b)
Parameter: HAP Input
Limit: The input of any combination of HAPs to the surface coating operation (Unit ID #13a and #13b) shall be less than nineteen and four-tenths (19.4) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Address: 890 West Huntington Street, Montpelier, Indiana 47359
Mailing Address: 890 West Huntington Street, Montpelier, Indiana 47359
FESOP No.: F009-15894-00023
Facility: Surface coating operation (Unit ID #13a and #13b)
Parameter: VOC Input
Limit: The total VOC input to the surface coating operation (Unit ID #13a and #13b) shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
 Source Address: 890 West Huntington Street, Montpelier, Indiana 47359
 Mailing Address: 890 West Huntington Street, Montpelier, Indiana 47359
 FESOP No.: F009-15894-00023

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. 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".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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.

Attachment A

Fugitive Particulate Matter Emission Control Plan
Indiana Veneer Products Division of Harris-Tarkett, Inc.
890 West Huntington Street, Montpelier, Indiana 47359
Responsible Official: Tony McCain, Operations Manager
Phone 765-728-2438

Processes, operations, and areas which have the potential to emit fugitive particulate matter in accordance with 326 IAC 6-5-4 include the sawdust handling operations.

Pursuant to 326 IAC 6-5, the following measures shall be implemented to control fugitive particulate matter emissions from these activities:

- (1) Fugitive particulate emissions from sawdust handling shall be controlled on an as needed basis using water as suppressant and periodic sweeping.

To document compliance with this plan, records shall be maintained on site for a period of five (5) years and shall be made available upon request to IDEM/OAQ. The records shall document all control measures and activities implemented.

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

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

Source Background and Description

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Location: 890 West Huntington Street, Montpelier, Indiana 47359
County: Blackford
SIC Code: 2435
Operation Permit No.: F009-15894-00023
Permit Reviewer: ERG/TDP

On July 25, 2007, the Office of Air Quality (OAQ) had a notice published in the News Times, Montpelier, Indiana, stating that Indiana Veneer Products Division of Harris-Tarkett, Inc. (Indiana Veneer) had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an oak veneer floor manufacturing 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 September 20, 2007, Indiana Veneer submitted comments on the proposed FESOP. The summary of the comments is as follows. 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.

Comment 1:

Are HAPs and VOC on the quarterly report only for surface coating operations?

Response to Comment 1:

The quarterly reporting forms located on pages 38-40 of the permit only apply to the surface coating operations. No changes have been made to the permit as a result of this comment.

Comment 2:

Is it a violation if the HAP and VOC content of the coatings exceed the 9.3 and 19.4 ton limits, provided the total PTE of VOC and HAP is less than 10 tons per year of a single HAP and less than 25 tons per year of total HAP?

Response to Comment 2:

The Permittee is out of compliance with their permit if the surface coating operation exceeds the 9.3 ton per year single HAP limit or the 19.4 ton per year total HAP limits of Condition D.2.1. These limits are federally enforceable limits, and were structured such that when HAP emissions from the boilers, presses, and dryer are included, the source total emissions of a single HAP remain less than ten (10) tons per year and the source total emissions of any combination of HAPs remain less than twenty-five (25) tons per year. The Permittee must abide by the limits on

the surface coating operation to comply with 326 IAC 2-8 (Federally Enforceable State Operating Permits). No changes have been made to the permit as a result of this comment.

Comment 3:

Indiana Veneer requests a shorter version of the Asbestos Abatement Projects condition.

Response to Comment 3:

The permit has been updated as follows:

~~C.7 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 46204-2254~~

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Upon further review, the OAQ has decided to make the following revisions to the permit.

1. IDEM, OAQ has corrected a typographical error in Section A.2(a) and Section D.1 as follows:

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

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

Boilers

- (a) One (1) wood-fired boiler, identified as Unit ID #1, constructed in 1999, with a maximum heat input rate of 29.97 million British thermal units per hour, combusting wood chips and bark, utilizing a cyclone for particulate matter control, exhausting through one (1) stack, identified as S/V ID #1 used to provide heat for a veneer dryer and steam log ~~warming~~ **warming**.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Boilers

- (a) One (1) wood-fired boiler, identified as Unit ID #1, constructed in 1999, with a maximum heat input rate of 29.97 million British thermal units per hour, combusting wood chips and bark, utilizing a cyclone for particulate matter control, exhausting through one (1) stack, identified as S/V ID #1 used to provide heat for a veneer dryer and steam log ~~warming~~ **warming**.

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

2. 40 CFR 60, Subpart Dc was revised on June 13, 2007. However, pursuant to 326 IAC 1-1-3, the version of the rule referenced by 326 IAC 12 was the version in existence on February 27, 2006. Only the Federal version of the rule applies, if the Federal version is different from the state version. Therefore, Section D.1 has been updated as follows:

D.1.5 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, ~~which are incorporated by reference as 326 IAC 12-1~~ for the one (1) wood-fired boiler (Unit ID#1) and the one (1) natural gas-fired boiler (Unit ID#2), except as otherwise specified in 40 CFR Part 60, Subpart Dc.

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3. IDEM, OAQ has corrected a typographical error the Quarterly Deviation and Compliance Monitoring Report as follows:

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

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

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Address: 890 West Huntington Street, Montpelier, Indiana 47359
Mailing Address: 890 West Huntington Street, Montpelier, Indiana 47359
FESOP No.: F009-15894-00023

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

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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".

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Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Source Location: 890 West Huntington Street, Montpelier, Indiana 47359
County: Blackford
SIC Code: 2435
Operation Permit No.: F009-15894-00023
Permit Reviewer: ERG/TDP

The Office of Air Quality (OAQ) has reviewed a FESOP application from Indiana Veneer Products Division of Harris-Tarkett, Inc. relating to the operation of an oak veneer floor manufacturing plant and the modification to an existing surface coating operation.

Permitted Emission Units and Pollution Control Equipment

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

Boilers

- (a) One (1) wood-fired boiler, identified as Unit ID #1, constructed in 1999, with a maximum heat input rate of 29.97 million British thermal units per hour, combusting wood chips and bark, utilizing a cyclone for particulate matter control, exhausting through one (1) stack, identified as S/V ID #1 used to provide heat for a veneer dryer and steam log warming.
- (b) One (1) natural gas-fired boiler, identified as Unit ID #2, constructed in 1999, with a maximum heat input rate of 10.47 million British thermal units per hour, used as a backup boiler, exhausting through one (1) stack, identified as S/V ID #2.

Surface Coating

- (c) Two (2) surface coating booths, identified as Unit ID #13a and #13b, constructed in 1999, each with a maximum coating rate of 375 pounds of adhesive per hour, utilizing a rollcoating application system.

Woodworking

- (d) One woodworking operation, which consists of:
 - (1) One log sawing operation, constructed in 1999, with a maximum throughput of 15.3 tons/hr.
 - (2) One sawdust handling operation, constructed in 1999, with a maximum throughput of 0.03 tons/hr.

- (3) One log debarking operation, constructed in 1999, with a maximum throughput of 15.6 tons/hr.
- (4) One veneer chipper, constructed in 1999, with a throughput rate of 15.6 tons per hour.
- (5) One chip silo, constructed in 1999, with a maximum capacity of 8,064 cubic feet. Chips are pneumatically conveyed to the silo from the chipper through an integral product separator (cyclone).
- (6) One silo loadout operation, constructed in 1999, in which knuckle-sized wet wood chips with a moisture content greater than 60%, are loaded from the silo by front end loader and transported to the boilers with a maximum throughput of 2.93 tons/hr.

Veneer Dryer and Presses

- (e) One (1) veneer dryer, constructed in 1999, heated with steam from the wood-fired boiler, with a maximum throughput of 20,000 pounds per hour.
- (f) Four (4) veneer hot presses, constructed in 1999, with a total maximum throughput of 750 pounds per hour.

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

There are no new emission units and pollution control equipment receiving new source review approval 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) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) Closed loop heating and cooling systems.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (d) Heat exchanger cleaning and repair.
- (e) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

The source has been constructed and has been operating under the following previous approvals:

- (a) AA009-12633-00023, issued on October 5, 2000; and
- (b) CP009-11014-00023, issued on September 14, 1999.

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 FESOP:

- (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) Condition D.1.3 (Testing Requirements) of CP009-11014-00023, issued September 14, 1999. This condition provided testing requirements for the wood-fired and natural gas-fired boilers to determine compliance with the limits pursuant to 326 IAC 6-2-4.

Reason Not Incorporated: This condition was removed from the permit because testing is not necessary for either of the boilers. AP-42 emission factors indicate compliance with the 326 IAC 6-2-4 limit.

Air Pollution Control Justification as an Integral Part of the Process

The Permittee has submitted the following justification such that the product separator (cyclone) conveying woodchips to the silo be considered as an integral part of the process:

The cyclone acts as an air/product separation device. Wet wood chips from the chipper are pneumatically conveyed, collected, and separated by the cyclone. The wet wood chips drop from the cyclone into the silo for storage and are used in Boiler #1 as fuel.

The cyclone collection system provides an economic benefit to the facility. The permittee provided a cost estimate using factors as set forth in EPA's Air Pollution Cost Control Manual, 6th Ed. Three (3) scenarios were provided:

- Scenario 1) The Permittee provided the costs of maintaining the current system in which wood chips from the veneer chipper are pneumatically conveyed to the cyclone, separated for storage, and then used as fuel.
- Scenario 2) The Permittee provided cost estimates for a scenario in which wood chips from the veneer chipper are collected separately, then hauled to the boiler auger feed independently for use as fuel. No presumption of moving the current system is included as this would cost more (\$100,000-\$150,000 separate current system) than the anticipated build-it-first theoretical scenario.
- Scenario 3) The Permittee provided cost estimates for a scenario in which the wood chips from the veneer chipper are collected separately and hauled away. New wood fuel is hauled in for use in the boiler.

A summary of the cost difference of each scenario is as follows:

Scenario	Present Worth (P)	Future Worth (F) 10 years	Annual Equivalent given 10 years
1	\$ 246,831	\$ 485,554	\$ 35,143
2	\$ 4,451,218	\$ 8,756,220	\$ 633,753
3	\$ 9,846,372	\$ 19,369,305	\$ 1,401,901

Therefore, the cyclone provides a significant cost benefit. IDEM, OAQ has evaluated the justifications and agreed that the cyclone will be considered as an integral part of the woodworking operation. Therefore, the permitting level will be determined using the potential to emit after the cyclone. Operating conditions in the proposed permit will specify that this cyclone shall operate at all times when the woodworking process is in operation.

Enforcement Issue

- (a) IDEM is aware that the Permittee did not apply for a Part 70 permit or FESOP within twelve (12) months after the source became subject to the Title V program. The source received a construction permit, CP009-11014-00023, on September 14, 1999, at which time they were a major source of CO. Construction was completed by the end of 1999. The FESOP application was received July 17, 2002.
- (b) IDEM is aware that the coating blend formulations in the surface coating operation have been modified prior to receipt of the proper permit. The change in coating formulation increased the potential to emit a single HAP (methanol) to greater than 10 tons per year.
- (c) IDEM is aware that the wood-fired boiler is not in compliance with the following provisions from F039-11014-00023:

Testing Requirements [326 IAC 2-1.1-11] : During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM or other methods as approved by the Commissioner.

- (d) IDEM is reviewing these matters and will take appropriate actions.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on July 17, 2002.

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

Emission Calculations

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

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.”

Pollutant	Potential to Emit (tons/yr)
PM	82.1
PM-10	79.7
SO ₂	3.31
VOC	37.9
CO	93.4
NO _x	33.5

HAPs	Potential to Emit (tons/yr)
Formaldehyde	6.80
Methanol	21.9
Diethanolamine	0.06
Vinyl Acetate	0.19
Benzene	Negligible
Hydrogen Chloride	2.49
Hexane	0.08
Lead	Negligible
Acrolein	0.53
Manganese	0.21
Styrene	0.25
TOTAL	32.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. However, this source which would otherwise be subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program) has elected to limit HAP emissions to less than major source thresholds and operate pursuant to 326 IAC 2-8 (FESOP Program).
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Prevention of Significant Deterioration) and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to become a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission unit	Potential to Emit After Issuance (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Wood-Fired Boiler (Unit ID #1)	28.9*	28.5	3.28	2.23	78.75	28.88	Highest Single HAP (Hydrogen Chloride) 2.49 Total HAP 4.62
Natural Gas-Fired Boiler (Unit ID #2)	0.09*	0.35	0.03	0.25	3.85	4.59	Highest Single HAP (Hexane) 0.08 Total HAP 0.09
Surface Coating (Unit ID #13a & 13b)	0	0	0	Less than 25 (326 IAC 8- 1-6)	0	0	Less than 9.3 for a single HAP; Less than 19.4 for any combination of HAPs (326 IAC 2-7)
Cyclone Collection (silo)	13.7	13.7	0	0	0	0	0
Log Debarking	1.64	1.64	0	0	0	0	0
Log Sawing	23.4	23.4	0	0	0	0	0
Veneer Dryer	0	0	0	3.18	10.8	0	Highest Single HAP

Process/ Emission unit	Potential to Emit After Issuance (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
							(Methanol) - 0.45 Total HAP - 0.81
Veneer Presses	0	0	0	0.08	0	0	Highest Single HAP (Methanol) -0.06 Total HAP - 0.07
Total PTE After Issuance	67.7	67.6	3.31	Less than 30.7	93.4	33.5	Less than 10.0 for a single HAP; Less than 25.0 for any combination of HAPs

Neg = Negligible

* PM emissions from combustion are shown at maximum capacity (without control), which are less than the respective emission limits pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating).

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO ₂	Attainment
NO _x	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Blackford County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 emissions and NO_x are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source Section.
- (c) Blackford County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Federal Rule Applicability

- (a) The wood-fired boiler (Unit ID #1) is subject to the requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it was constructed after June 9, 1989 and has a maximum capacity greater than ten (10) million British thermal units per hour. Pursuant to 40 CFR

60.43c(b), the wood-fired boiler (Unit ID #1) is not subject to an emission limitation because its maximum capacity is less than thirty (30) million British thermal units per hour. Only wood-fired boilers with capacities greater than 30 MMBtu per hour are subject to the particulate emission limitations in this NSPS. Pursuant to this subpart, the Permittee shall record and maintain records of the amount and type of fuel combusted during each month for a period of five years following the date of such record.

- (1) 40 CFR 60.40c(a),(b)
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.48c(a)(1)-(3), (g), (i), (j)

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1-1, apply except when otherwise specified in 40 CFR 60, Subpart Dc. 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 June 13, 2007.

- (b) The natural gas-fired boiler (Unit ID #2) is subject to the requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it was constructed after June 9, 1989 and has a maximum capacity greater than ten (10) million British thermal units per hour. Pursuant to 40 CFR 60, Subpart Dc, no emission limitations are applicable to boiler #2 because it does not combust coal, wood, or oil. Pursuant to this subpart, the Permittee shall record and maintain records of the amount and type of fuel combusted during each month for a period of five years following the date of such record.

- (1) 40 CFR 60.40c(a),(b)
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.48c(a)(1)-(3), (g), (i), (j)

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1-1, apply except when otherwise specified in 40 CFR 60, Subpart Dc. 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 June 13, 2007.

- (c) The requirements of 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) are not included in this permit because this source does not manufacture wood furniture or wood furniture components as described in 40 CFR 63.801.
- (d) The requirements of 40 CFR 63, Subpart DDDD (National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, which has a compliance date of October 1, 2008, are not included in this permit. This source has requested limits on HAP emissions of less than 10.0 tons per year individual HAP and less than 25.0 tons per year total HAP. Therefore, this source is an area source and not subject to this rule.
- (e) The requirements of 40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters, which has a compliance date of September 13, 2007, are not included in this permit. This source has requested limits on HAP emissions of less than 10.0 tons per year individual HAP and less than 25.0 tons per year total HAP. Therefore, this source is an area source and not subject to this rule.
- (f) The provisions of 40 CFR 64, Compliance Assurance Monitoring are not included in this permit. In order for this rule to apply, a pollutant specific emissions unit (PSEU) 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 potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount required for a source to be classified

as a major source. Additionally, the source would have to be receiving a Part 70 permit. This source is not receiving a Part 70 permit and is therefore not subject to CAM.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was constructed after the implementation of the PSD rules and is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because it is not one (1) of the twenty-eight (28) listed source categories and it does not have the potential to emit two hundred fifty (250) tons per year of any regulated pollutant. In January 2002, the source modified the formulation of the coatings used in the surface coating booths #13a and #13b. This change increased the potential to emit of HAPs. However, because the potential to emit of VOC remained less than 250 tons per year, the source remained a minor source under PSD.

326 IAC 2-4.1 (Hazardous Air Pollutants)

In CP009-11014-00023, issued September 14, 1999, the requirements of 326 IAC 2-4.1 (Hazardous Air Pollutants) did not apply to this source, even though the source was constructed after July 27, 1997, because the potential to emit was less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of any combination of HAPs. The original construction permit incorrectly listed one spray booth instead of the two spray booths included in the application. This error was corrected in Administrative Amendment 009-11014-00023, issued October 5, 2000. This change did not affect the potential to emit for the source because the emission calculations for the surface coating operation included in the original construction permit were based on two surface coating booths each having a maximum coating rate of 375 pounds per hour, using specific coating blends.

In January 2002, the coating blend formulations in the surface coating booths (Unit ID #13a and #13b) changed. This change increased the potential to emit of a single HAP to greater than ten (10) tons per year, and greater than twenty-five (25) tons per year of any combination of HAPs. However, because this change was a change in the method of operation, and not a reconstruction of the surface coating booths, this modification was not subject to 326 IAC 2-4.1

326 IAC 2-6 (Emission Reporting)

This source is located in Blackford County and is not required to operate pursuant to a Part 70 Permit, and does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, this source is only subject to the provisions 326 IAC 2-6-5 (Additional Information Requests).

326 IAC 2-8 (FESOP)

The HAP emissions from this source are greater than 10 tons per year for a single HAP (Methanol) and greater than 25 tons per year for total HAPs. The source has agreed to limit the amount of HAP used in the surface coating such that the emissions of HAP from the entire source remain below the major source thresholds. The potential to emit PM₁₀, SO₂, VOC, CO, and NO_x are all less than the 100 tons per year major source threshold without specific limits.

- (a) The input of any single HAP to the surface coating operation (Unit ID #13a and #13b) shall be less than nine and three-tenths (9.3) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The input of any combination of HAPs to the surface coating operation (Unit ID #13a and #13b) shall be less than nineteen and four-tenths (19.4) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

These limits are structured such that, when HAP emissions are included from the boilers, presses, and dryer, the source total emissions of a single HAP remain less than ten (10) tons per year and the source total emissions of any combination of HAPs remain less than twenty-five (25) tons per year. Compliance with these limitations render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 5-1 (Visible Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

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 subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because this source was constructed after December 13, 1985 and has the potential to emit twenty-five (25) tons per year of fugitive particulate matter. The fugitive dust plan consists of using water as a suppressant and periodic sweeping for the sawdust handling operation (see Attachment A).

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

This source is not subject to the requirements of 326 IAC 9-1-2 (Carbon Monoxide Emission Limits) because this source is not a petroleum refiner, ferrous metal smelter, or solid waste incinerator.

State Rule Applicability - Wood-Fired Boiler (Unit ID #1) and Natural Gas-Fired Boiler (Unit ID #2)

326 IAC 6-2-4 (Emission Limitations For Sources of Indirect Heating)

The wood-fired boiler (Unit ID #1) and the natural gas-fired boiler (Unit ID #2) are subject to the requirements of 326 IAC 6-2-4 (Emission Limitations For Sources of Indirect Heating) because they were constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4, the particulate emissions from the wood-fired boiler (Unit ID #1) and the natural gas-fired boiler (Unit ID #2) shall be limited to less than 0.42 pounds per million British thermal unit of heat input, each. This limit was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{(40.44)^{0.26}} = 0.42 \text{ lb/MMBtu}$$

Where Pt = pounds of particulate emitted per million British thermal unit heat input
Q = total source maximum operation capacity (29.97 + 10.47 = 40.44 MMBtu/hr)

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

The wood-fired boiler (Unit ID #1) and the natural gas-fired boiler (Unit ID #2) are not subject to the requirements of 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because they do not have the potential to emit greater than twenty-five (25) tons per year of sulfur dioxide.

326 IAC 12 (New Source Performance Standards)

The wood fired-boiler (Unit ID #1) and the natural gas-fired boiler (Unit ID #2) are subject to 326 IAC 12 (New Source Performance Standards). 326 IAC 12 incorporates by reference 40 CFR 60, Subpart Dc. The Permittee will comply with the provisions of 40 CFR 60, Subpart Dc as detailed in the Federal Rule Applicability Determination section above.

Subpart Dc was revised on June 13, 2007. However, pursuant to 326 IAC 1-1-3, the version of the

rule referenced by 326 IAC 12 was the version in existence on July 1, 2005, which had been most recently amended on June 13, 2007. Therefore, the June 13, 2007 amendments to the federal rule are not approved into the 326 IAC, and the boilers #1 and #2 at this source are subject to both versions of the rule. When the revised rule is incorporated into the 326 IAC, the Permittee may apply for a revision to the permit to remove any requirements from the previous version of the rule that are not present in the updated version of the rule. All of the requirements of the 326 IAC 12 rule that are applicable to this source are the same as the requirements listed under the Federal Rule Applicability Determination section except for the following:

- (a) 40 CFR 60.48c(g)

Pursuant to the 326 IAC version of 40 CFR 60.48c(g), the Permittee must keep daily records of the fuel burned in the boilers. The new version of 40 CFR 60.48c(g) allows for the Permittee to keep monthly records of the fuel burned in the boilers. Both versions will be included in the permit.

326 IAC 8-1-6 (Best Available Control Technology)

The wood fired-boiler (Unit ID #1) and the natural gas-fired boiler (Unit ID #2) are not subject to 326 IAC 8-1-6 (Best Available Control Technology), because the potential to emit VOC from the boilers is less than twenty-five (25) tons per year.

State Rule Applicability - Surface Coating Operation (Unit ID #13a and #13b), Veneer Dryer, and Veneer Presses

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

- (a) Pursuant to 326 IAC 6-3-1(b)(6) (Particulate Emission Limitations for Manufacturing Processes), the surface coating operation (Unit ID #13a and #13b) is not subject to 326 IAC 6-3. The resin is applied with using roll coating, which has been specifically exempted from the requirements of 326 IAC 6-3-2.
- (b) Pursuant to 326 IAC 6-3-1(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the veneer dryer and veneer presses are not subject to particulate emission limitations. The potential emissions from these operations are negligible and do not exceed 0.551 pounds per hour.

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

Pursuant to CP009-11014-00023, issued September 14, 1999, and AA009-12633-00023, issued October 5, 2000, the VOC input to the surface coating operations (Unit ID #13a and #13b), combined, shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

Note that this limit was accepted upon construction of the surface coating operations (Unit ID #13a and #13b). Therefore, the combined emissions from these two facilities have been limited to less than twenty-five (25) tons per year since they were constructed at the source in 1999. The actual emissions of VOC from the surface coating operations have never exceeded this limit.

The veneer dryer and presses are not subject to 326 IAC 8-1-6 because the potential to emit from these operations is less than 25 tons per year each.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

The surface coating operation (Unit ID #13a and #13b) is not subject to the requirements of 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations) because this source is not involved in flat wood manufacturing and surface finishing of printed interior panels made of hardwood plywood and thin particle board, natural finish hardwood plywood panels, or hardboard paneling with Class II finishes.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The surface coating operation (Unit ID #13a and #13b) is not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because this source applies coating to veneer flooring, not wood furniture, wood furnishing, or wood cabinets.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because this source is located in Blackford County and was not constructed between October 7, 1974 and January 1, 1980.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source is not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) because it is located in Blackford County.

State Rule Applicability - Woodworking Operations

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the log sawing, veneer chipping, and silo loadout operations shall not exceed the pound per hour emission rate shown in the table below:

Emission Unit	Maximum Throughput (tons/hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hour)
Log Sawing	15.3	25.5
Veneer Chipping	15.6	25.8
Silo Loadout Operation	2.9	8.4

These limitations were calculated using the following equation:

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

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

(b) Pursuant to 326 IAC 6-3-1(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the log debarking operation and the sawdust handling operation are not subject to 326 IAC 6-3-2. The potential emissions from these operations do not exceed 0.551 pounds per hour.

Testing Requirements

Testing is not required for the wood-fired or natural gas-fired boilers. AP-42 emission factors indicate compliance with the 326 IAC 6-2-4 limit. 326 IAC 6-2-4 limits emissions to 0.42 pounds per million British thermal units. The AP-42 emission factor for uncontrolled PM from wood burning boilers is 0.33 pounds per million British thermal units. Also the wood boiler operates with a cyclone for particulate control, further assuring its compliance with the rule. The AP-42 emission factor for the natural gas fired boiler is 0.002 pounds per million British thermal units.

Testing is not required for the surface coating operations because the only limits applicable to the surface coating operations are HAP and VOC limits. Compliance with these limits will be ensured through record keeping and quarterly reporting.

Testing is not required for the woodworking operations. Based on AP-42 emission factors, the log sawing and silo loadout operations will be able to comply with the 326 IAC 6-3-2 allowable emission rates. The veneer chipping operation uses an integral cyclone collection system that routes all chips to the silo, and, based on the potential to emit after cyclone, will be able to comply with the 326 IAC 6-3-2 allowable emission rates.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The wood-fired boiler (Unit ID #1) has applicable compliance monitoring conditions as specified below:
 - (a) Once per day visible emissions notations of S/V ID #1 exhaust shall be performed during normal daylight operations while burning wood. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. 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. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from of this permit.

These monitoring conditions are necessary because the wood-fired boiler (Unit ID #1) must operate properly to ensure compliance with 326 IAC 6-2-4 (Emission Limitations For Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

2. The woodworking operation, including log sawing, veneer chipping, and the silo storage collection operation, has applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of the woodworking processes 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) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

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

These monitoring conditions are necessary because the cyclone directing chips to the silo must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

Conclusion

The operation of this oak veneer floor manufacturing plant shall be subject to the conditions of the attached proposed FESOP No.: F009-15894-00023.

Attachment A

Fugitive Particulate Matter Emission Control Plan
Indiana Veneer Products Division of Harris-Tarkett, Inc.
890 West Huntington Street, Montpelier, Indiana 47359
Responsible Official: Tony McCain, Operations Manager
Phone 765-728-2438

Processes, operations, and areas which have the potential to emit fugitive particulate matter in accordance with 326 IAC 6-5-4 include the sawdust handling operations.

Pursuant to 326 IAC 6-5, the following measures shall be implemented to control fugitive particulate matter emissions from these activities:

- (1) Fugitive particulate emissions from sawdust handling shall be controlled on an as needed basis using water as suppressant and periodic sweeping.

To document compliance with this plan, records shall be maintained on site for a period of five (5) years and shall be made available upon request to IDEM/OAQ. The records shall document all control measures and activities implemented.

Appendix A: Emissions Calculations

Wood-fired Boiler

Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address City IN Zip: 890 West Huntington Street, Montpelier, Indiana 47359
Permit Number: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007

Heat Input Capacity
 MMBtu/hr

29.97

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor (prior to control) in lb/MMbtu	0.33	0.31	0.025	0.22	0.017	0.60
Potential Emission (prior to control) in tons/yr	43.3	40.7	3.28	28.9	2.23	78.8
Emission Factor (after control) in lb/Mmbtu	0.22	0.22	N/A	N/A	N/A	N/A
Potential Emission (after control) in tons/yr	28.9	28.5	N/A	N/A	N/A	N/A

METHODOLOGY

PM10 emission factors include filterable and condensable PM.

Emission Factors are from AP 42, Chapter 1.6, Wood Residue Combustion in Boilers (September, 2003), Tables 1.6-1, 1.6-2, 1.6-3, 1.6-4, and 1-6.5 for wet wood. Bark is not burned at this facility. The wood-fired boiler utilizes a cyclone for particulate control.

Emissions (ton/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 hr/yr / 2000 lb/ton

Appendix A: Emissions Calculations

Wood-fired Boiler

Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address City IN Zip: 890 West Huntington Street, Montpelier, Indiana 47359
Permit Number: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007

HAPs - Organics

Emission Factor in lb/MMBtu	Acrolein 4.0E-03	Benzene 4.2E-03	Formaldehyde 4.4E-03	Hydrogen Chloride 1.9E-02	Styrene 1.9E-03
Potential Emission in tons/yr	5.25E-01	5.51E-01	5.78E-01	2.49	2.49E-01

HAPs - Metals

Emission Factor in lb/MMBtu	Lead 4.8E-05	Mercury 3.5E-06	Arsenic 2.2E-05	Manganese 1.6E-03	Nickel 3.3E-05	Total HAP 3.5E-02
Potential Emission in tons/yr	6.30E-03	4.59E-04	2.89E-03	2.10E-01	4.33E-03	4.62

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations

Natural Gas-fired Boiler

Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address City IN Zip: 890 West Huntington Street, Montpelier, Indiana 47359
Permit Number: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007

Date:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.47	91.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.09	0.35	0.03	4.59	0.25	3.85

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas-fired Boiler

Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address City IN Zip: 890 West Huntington Street, Montpelier, Indiana 47359
Permit Number: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.63E-05	5.50E-05	3.44E-03	8.25E-02	1.56E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.29E-05	5.04E-05	6.42E-05	1.74E-05	9.63E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and Particulate Emissions from Surface Coating
Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address City IN Zip: 890 West Huntington Street, Montpelier, Indiana 47359
Permit Number: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CR-596	10.86	32.68%	31.63%	1.05%	41.24%	57.71%										
H-5400	10.76	39.46%	39.41%	0.05%	50.91%	49.05%										
H-5900	10.43	39.05%	38.93%	0.12%	48.74%	51.14%										
Mix A (5 parts CR-596 & 1 part H-5400 - 3-oak panels)	10.84	33.81%	32.93%	0.88%	42.85%	56.27%	0.15000	142.000	0.17	0.10	2.03	48.83	8.91	0.00	0.17	100%
Mix B (3 parts CR-596 & 1 part H-5900 - 3-maple panels)	10.75	34.27%	33.46%	0.82%	43.12%	56.07%	0.15000	132.000	0.15	0.09	1.74	41.71	7.61	0.00	0.16	100%
Mix C (5 parts CR-596 & 1 part H-5400 - 5-oak panels)	10.84	33.81%	32.93%	0.88%	42.85%	56.27%	0.30000	70.000	0.17	0.10	2.01	48.15	8.79	0.00	0.17	100%
Mix D (3 parts CR-596 & 1 part H-5900 - 5-maple panels)	10.75	34.27%	33.46%	0.82%	43.12%	56.07%	0.30000	64.000	0.15	0.09	1.69	40.44	7.38	0.00	0.16	100%
Total													32.69	0.00		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations

HAP Emissions from Surface Coating

Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address City IN Zip: 890 West Huntington Street, Montpelier, Indiana 47359
Permit Number: 009-15894-00023
Pit ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % Methanol	Weight % Diethanolamine	Weight % Vinyl Acetate	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Diethanolamine Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)
CR-596	10.86			0.190%	0.679%	0.002%	0.000%				
H-5400	10.76			0.000%	0.030%	0.000%	0.016%				
H-5900	10.43			0.072%	0.020%	0.000%	0.029%				
Mix A (5 parts CR-596 & 1 part H-5400 - 3-oak panels)	10.84	0.15000	142.000	0.16%	0.57%	0.00%	0.00%	1.60	5.77	0.02	0.03
Mix B (3 parts CR-596 & 1 part H-5900 - 3-maple panels)	10.75	0.15000	132.000	0.16%	0.51%	0.00%	0.01%	1.50	4.80	0.01	0.07
Mix C (5 parts CR-596 & 1 part H-5400 - 5-oak panels)	10.84	0.30000	70.000	0.16%	0.57%	0.00%	0.00%	1.58	5.69	0.02	0.03
Mix D (3 parts CR-596 & 1 part H-5900 - 5-maple panels)	10.75	0.30000	64.000	0.16%	0.51%	0.00%	0.01%	1.45	4.65	0.01	0.07
Total								6.13	20.91	0.06	0.19

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations

Woodworking

Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address City IN Zip: 890 West Huntington Street, Montpelier, Indiana 47359
Permit Number: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007

Process	Throughput (ton/hr)	Emission Factor (lb/ton)*	PTE PM/PM10 (ton/yr)	Controlled PTE PM/PM10 (ton/yr)
Veneer Chipper w/ Cyclone Collection**	15.625	--	136,875	13.7
Log Debarking	15.625	0.02	1.64	1.64
Log Sawing	15.25	0.35	23.4	23.4
Total			136,900	38.7
<i>Fugitive</i>				
Sawdust Handling	0.03	1.00	0.12	0.12
Silo Load Out***	2.925	2.00	25.6	25.6
Total			25.7	25.7

*Emission factors obtained from AP-42 (1985) Table 10.3-1, 10.3-2, and 10.4-1. Note that these emission factors are for dry wood rather than wet wood. The wood at this source has a moisture content of 60%.

**The cyclone is used as a integral product collection device. The product collected by the cyclone is large wet chips of knuckle size or larger (~1000 um). Uncontrolled emissions from the cyclone are calculated assuming all product from the chipper is emitted to the atmosphere. Controlled emissions are based on a 99.99% control efficiency from the cyclone, because the product is large wet wood chips. The source provided a vendor guarantee for this efficiency.

***The silo load operation uses a front end loader to collect wood chips from the silo hopper. Note that the emission factor for silo load out is for sawdust rather than wet wood chips. An emission factor for wet wood chips was not available.

Emissions = Throughput (ton/hr) * Emission Factor (lb/ton) * 8760 (hr/yr) / 2000 (lb/ton)

**Appendix A: Emissions Calculations
One (1) Veneer Dryer**

**Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address: 890 West Huntington Street, Montpelier, Indiana 47359
Registration: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007**

**Max. Throughput
(MSF/year)**

94,194

Pollutant

	PM	PM10	SO ₂	NOx	VOC	CO
*Emission Factor (lb/MSF)	NA	NA	NA	NA	0.068	0.23
Potential To Emit (tons/year)	NA	NA	NA	NA	3.18	10.8

*Emission factors are from AP-42 Chapter 10.5 (Plywood Manufacturing), Tables 10.5-2 and 10.5-3. SCC # 3-07-007-34, SCC # 3-07-007-35 (01/02).
The maximum throughput of wood is based on a maximum wood density of 930 kg/m³ or 1860 lb/MSF 3/8 for oak.

Note: When estimating total emissions from direct-fired hardwood drying process, emissions from heated zone and cooling section of the veneer dryer were combined.

METHODOLGY

PTE (tons/year) = Max. Throughput (MSF/year) * Emission Factor (lb/MSF of 3/8 inch thick veneer) * 1ton/2000 lbs

HAPs

	Acetaldehyde	Formaldehyde	Methanol
*Emission Factor (lb/MSF)	0.0052	0.0025	0.0095
Potential To Emit (tons/year)	0.24	0.12	0.45

Methodology is the same as above.

**Appendix A: Emissions Calculations
Four (4) Veneer Presses**

**Company Name: Indiana Veneer Products Division of Harris-Tarkett, Inc.
Address: 890 West Huntington Street, Montpelier, Indiana 47359
Registration: 009-15894-00023
Plt ID: 009-00023
Reviewer: ERG/TDP
Date: July 11, 2007**

**Max. Throughput
(MSF/year)**

3,532

Pollutant

	PM	PM10	SO ₂	NOx	VOC	CO
*Emission Factor (lb/MSF)	NA	NA	NA	NA	0.047	NA
Potential To Emit (tons/year)	NA	NA	NA	NA	0.08	NA

*Emission factors are from AP-42 Chapter 10.5 (Plywood Manufacturing), Tables 10.5-6 SCC # 3-07-007-85 (01/02).
The maximum throughput of wood is based on a maximum wood density of 930 kg/m³ or 1860 lb/MSF 3/8 for oak.

METHODOLOGY

PTE (tons/year) = Max. Throughput (MSF/year) * Emission Factor (lb/MSF of 3/8 inch thick veneer) * 1ton/2000 lbs

HAPs

	MIBK	Formaldehyde	Methanol
*Emission Factor (lb/MSF)	0.0057	0.0047	0.032
Potential To Emit (tons/year)	0.01	0.008	0.06

Methodology is the same as above.