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

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

April 28, 2004

TO: Interested Parties / Applicant

RE: Rockland Wood Products / 181-16784-00041

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 9/16/03

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(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR QUALITY

Rockland Wood Products, LLC
8089 North 200 West
Monon, Indiana 47959

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

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

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

Operation Permit No.: F181-16784-00041	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 28, 2004 Expiration Date: April 28, 2009

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

TABLE OF CONTENTS (Continued)

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary laminate flooring manufacturing plant.

Authorized Individual:	CEO
Source Address:	8089 North 200 West, Monon, Indiana 47959
Mailing Address:	8089 North 200 West, Monon, Indiana 47959
General Source Phone:	(219) 253-8306
SIC Code:	3715
County:	White
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not in 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:

(a) Woodworking shop (identified as 5-003), with a maximum throughput rate of 3082 board feet of raw wood per hour to produce truck floors, and using two baghouses (identified as 5-003a and 5-003b) as controls. These units were constructed in 1983.

(b) One (1) 30 million BTU per hour wood-fired boiler (identified as 5-001), exhausting at Stack 5-001a. This boiler was installed in 1975.

(c) One (1) 29 million BTU per hour wood-fired dutch oven boiler (identified as 5-002), using a multi-cyclone collector as control, and exhausting at Stack 5-002a. This boiler was installed in 1995.

(d) One (1) wood gluing operation (identified as 5-012), with a maximum throughput rate of 150 pounds of resin per hour. This unit was installed in 1995.

(e) One (1) wood undercoating booth, with a maximum throughput rate of 21.5 gallons of coating per hour and using dry filters as control. This unit was constructed in 1995.

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

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

(a) Natural gas-fired combustion units with heat input capacity equal to or less than ten (10) MMBtu per hour.

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. This unit was installed in 1983.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This unit was installed in 1983.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Cleaners and solvents characterized as follows:

(A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;

(B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured as 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(k) Closed loop heating and cooling systems.

(l) Infrared cure equipment.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(n) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(p) Blowdown for any of the following: sight glass, boiler, compressors, and cooling tower.

(q) Stationary fire pumps.

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).

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

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) The Permittee shall implement the PMPs, including any required record-keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

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

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

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

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

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

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

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

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

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

IDEM, OAQ
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the

emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

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

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

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

(1) That this permit contains a material mistake.

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

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

(c) Proceedings by IDEM, OAQ , to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

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

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

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

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

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

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

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

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC

2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

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

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.10 Performance Testing [326 IAC 3-6]

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

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

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

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

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

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

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

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

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

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.16 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.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. In a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

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

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

C.19 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.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

(d) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) Woodworking shop (identified as 5-003), with a maximum throughput rate of 3082 board feet of raw wood per hour to produce truck floors, and using two baghouses (identified as 5-003a and 5-003b) as controls. These units were constructed in 1983.

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

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

D.1.1 Particulate [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 2-8, PM10 emissions from the woodworking shop shall not exceed 4.54 pounds per hour. This limit is equivalent to 19.9 tons per year from the woodworking shop and less than 100 tons per year from the entire source.

Compliance with this limit renders 326 IAC 2-7(Part 70 Permit Program) not applicable to the source and ensures PSD minor source status.

D.1.2 Particulate [326 IAC 6-3] [326 IAC 2-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking shop shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,637 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

(b) Compliance with this limit ensures PSD minor source status.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.1 and D.1.2, the two (2) baghouses (identified as 5-003a, and 5-003b) for particulate control shall be in operation and control emissions from the woodworking shop at all times that the woodworking shop is in operation.

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

During the period between 30 and 36 months after the issuance of this FESOP, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM10 testing for the two (2) baghouses controlling the particulate emissions from the woodworking shop utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. PM10 includes filterable and condensible PM10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.6 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack exhaust used in conjunction with the woodworking shop shall be performed during normal daylight operations when exhausting to the atmosphere A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.7 Baghouse Inspections

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

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the woodworking shop stack exhaust.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.

(c) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) 30 million Btu per hour wood-fired boiler (identified as 5-001), exhausting at Stack 5-001a. This boiler was installed in 1975.

(c) One (1) 29 million Btu per hour wood-fired dutch oven boiler (identified as 5-002), using a multi-cyclone collector as control, and exhausting at Stack 5-002a. This boiler was installed in 1995.

(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 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to emission unit ID 5-002 as described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.2.2 Fuel Usage Limitation [326 IAC 2-8]

Pursuant to 326 IAC 2-8,

(a) The maximum amount of wood burned in the two (2) wood-fired boilers (identified as 5-001 and 5-002), shall be limited to a combined total of 20,600 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The emission rate of PM10, NOx, and CO shall be limited to 0.36, 0.49, and 0.60 lbs per MMBtu heat input, respectively.

(b) These limits are equivalent to a potential to emit of PM10, NOx and CO equal to 59.3, 80.9, 98.9 tons per year, respectively.

Compliance with these limits renders 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.2.3 Particulate [326 IAC 6-2-3] [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the PM emissions from all facilities use for indirect heating purposes which were existing and in operation after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input. Therefore, the wood fired boiler (identified as 5-001) shall be limited to 0.6 pounds of particulate matter per MMBtu heat input.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the wood fired boiler (identified as 5-002), which was existing and in operation after September 21, 1983 shall be limited to 0.38 pounds per million British thermal units heat input.

This limitation is based on the following equation:

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

Where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input (59.0 MMBtu per hour)

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.2.5 Visible Emissions Notations

(a) Once per shift visible emission notations of the two (2) wood-fired boilers (identified as 5-001 and 5-002) stack exhaust shall be performed 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 Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of the multi-cyclone collector controlling the wood fired dutch oven boiler (identified as 5-002). Inspections required by this condition shall not be performed in consecutive months.

D.2.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16][40 CFR 60, Subpart Dc]

D.2.8 Record Keeping Requirements

(a) Pursuant to 40 CFR, Subpart Dc and to document compliance with Condition D.2.2(a), the Permittee shall maintain daily records of the amount of wood burned in tons per year.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the two (2) wood fired boilers stack exhaust (identified as 5-001 and 5-002) once per shift.

(c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.

(d) To document compliance with Condition D.2.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2(a) shall be submitted to the addresses 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 required the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(e) One (1) wood gluing operation (identified as 5-012), with a maximum throughput rate of 150 pounds of resin per hour. This unit was installed in 1995.

(f) One (1) wood undercoating booth, with a maximum throughput rate of 21.5 gallons of coating per hour and using dry filters as control. This unit was constructed in 1995.

(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 Matter (PM) [40 CFR, Subpart P]

Pursuant to 40 CFR, Subpart P, the particulate emissions from the wood undercoating booth and wood gluing operation shall not exceed the pounds per hour limit calculated using the following equation:

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

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

D.3.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the wood undercoating facility shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.3.4 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the under coating booth stack while the under coating booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.3.5 Record Keeping Requirements

(a) To document compliance with Condition D.3.4, the Permittee shall maintain a log if weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

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

Emission Limitations and Standards

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

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.5 FACILITY OPERATION CONDITIONS

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

(a) Natural gas-fired combustion sources with heat input capacity equal to or less than ten (10) MMBtu per hour.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Cleaners and solvents characterized as follows:

(A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;

(B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured as 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(k) Closed loop heating and cooling systems.

(l) Infrared cure equipment.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(n) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(p) Blowdown for any of the following: sight glass, boiler, compressors, and cooling tower.

(q) Stationary fire pumps.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Rockland Wood Products, LLC
Source Address: 8089 North 200 West, Monon, Indiana 47959
Mailing Address: 8089 North 200 West, Monon, Indiana 47959
FESOP No.: F181-16784-00107

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
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Rockland Wood Products, LLC
Source Address: 8089 North 200 West, Monon, Indiana 47959
Mailing Address: 8089 North 200 West, Monon, Indiana 47959
FESOP No.: F181-16784-00107

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

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_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: Rockland Wood Products, LLC
Source Address: 8089 North 200 West, Monon, Indiana 47959
Mailing Address: 8089 North 200 West, Monon, Indiana 47959
FESOP No.: F181-16784-00107
Facility: Wood fired boilers (S-001) and (S-002)
Parameter: Amount of wood burned in two (2) wood fired boilers (S-001 and S-002) in tons per twelve (12) consecutive month period with compliance determined at the end of each month.
Limit: 20,600 tons per year

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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: Rockland Wood Products, LLC
Source Address: 8089 North 200 West, Monon, Indiana 47959
Mailing Address: 8089 North 200 West, Monon, Indiana 47959
FESOP No.: F181-16784-00107

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

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

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Rockland Wood Products, LLC
Source Location:	8089 North 200 West, Monon, Indiana 47959
County:	White
SIC Code:	3715
Operation Permit No.:	181-16784-00041
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP application from Rockland Wood Products, LLC relating to the operation of a laminate flooring manufacturing plant.

History

Rockland Wood Products, LLC purchased the laminate flooring facility located at 8089 North, 200 West, Monon, Indiana from HPA Monon Corporation. Rockland Wood Products, LLC will continue to operate the equipment used in conjunction with the laminate floor production and has now requested to operate under the provisions of 326 IAC 2-8 (FESOP). HPA Monon has a Title V Permit (T181-9293-00041, issued April 19, 2001).

Source Definition

Rockland Wood Products purchased the laminate flooring facility from HPA Monon Corporation. It is located at 8089 North, 200 West, Monon, Indiana 47959. HPA Monon Corporation still has several operations in Monon, Indiana, which are considered as one source.

(a) Plant 5, now owned by Rockland Wood Products, is located at 8089 North, 200 West, Monon, Indiana 47959; and

(b) Plant 1, 2, 6, 7, and 8, owned by HPA Monon Corporation, is located at 6929 US Highway 421 North, Monon, Indiana 47959.

The distance between Plant 5 and Plants 1, 2, 6, 7, and 8 is approximately 2.75 miles. Although all the plants operate under the same SIC code (SIC 3715), there are no support facilities shared between the two companies and they are not owned by the same company. Therefore, they will be considered two separate sources due to the reasons stated above. The current review covers plant 5, located at 8089 North, 200 West, Monon, Indiana 47959.

Permitted Emission Units and Pollution Control Equipment

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

(a) Woodworking shop (identified as 5-003), with a maximum throughput rate of 3082 board feet of raw wood per hour to produce truck floors, and using two baghouses (identified as 5-003a and 5-003b) as controls. These units were constructed in 1983.

(b) One (1) 30 million Btu per hour wood-fired boiler (identified as 5-001), exhausting at Stack 5-001a. This boiler was installed in 1975.

(c) One (1) 29 million Btu per hour wood-fired dutch oven boiler (identified as 5-002), using a multi-cyclone collector as control, and exhausting at Stack 5-002a. This boiler was installed in 1995.

(d) One (1) wood gluing operation (identified as 5-012), with a maximum throughput rate of 150 pounds of resin per hour. This unit was installed in 1995.

(e) One (1) wood undercoating booth, with a maximum throughput rate of 21.5 gallons of coating per hour and using dry filters as control. This unit was constructed in 1995.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no new emission units or pollution control equipment receiving approval.

Insignificant Activities

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

(a) Natural gas-fired combustion units with heat input capacity equal to or less than ten (10) MMBtu per hour.

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. This unit was installed in 1983.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This unit was installed in 1983.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Cleaners and solvents characterized as follows:

(A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;

(B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi

measured as 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(k) Closed loop heating and cooling systems.

(l) Infrared cure equipment.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(n) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(p) Blowdown for any of the following: sight glass, boiler, compressors, and cooling tower.

(q) Stationary fire pumps.

Existing Approvals

No previous approvals have been issued to this source.

Note: Rockland Wood Products, LLC purchased the laminate flooring facility from HPA Monon Corporation in December 2002 and submitted a request to operate under the provisions of 326 IAC 2-8 on February, 2003. The TV permit (T181-9293-00041) issued April 19, 2001 for HPA Monon Corporation is not a valid operating permit for Rockland Wood Products since the two (2) sources do not have any affiliations with each other.

Enforcement Issue

There are no enforcement actions pending.

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 February 7, 2003. Additional information was received on February 18, 2003 and February 20, 2003.

Emission Calculations

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

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2,244
PM10	2,244
SO_2	6.56
VOC	22.7
CO	157
NO_x	129

*For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Formaldehyde	5.75
Hydrogen Chloride	5.83
Benzene	1.10
Styrene	0.50
Acrolein	1.05
Total HAPs (from insignificant activities)	1.00
Total HAPs	15.2

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, CO and NOx is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM10	SO_2	VOC	CO	NO_X	HAPs
Wood Fired Boiler (5-001 and 5-002)	Less than 66.0	Less than 59.3	4.12	2.14	Less than 98.9	Less than 80.9	8.79
Woodworking Shop (5-003)	Less than 19.9	Less than 19.9	-	-	-	-	-
Under Coating	7.07	7.07	-	4.71	-	-	-
Wood Gluing	-	-	-	4.60		-	5.44
Insignificant Activities	5.00	5.00	0.10	10.0	-	0.10	1.00
Total Emissions	Less than 97.9	Less than 91.3	4.22	21.5	Less than 98.9	Less than 80.9	15.2

County Attainment Status

The source is located in White County.

Pollutant	Status
PM10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. White County has been designated as attainment or unclassifiable for ozone. Therefore, these emissions were reviewed pursuant to the requirements for Preventiono f Significant Deterioration (PSD), 326 IAC 2-2.

(b) White County has been classified as attainment for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

(a) The requirements of 40 CFR Part 60, Compliance Assurance Monitoring are not applicable because this source has accepted limitations on its potential to emit and agreed to operate under a Federally Enforceable State Operating Permit.

(b) Although the 30.9 MMBtu per hour wood-fired boiler (identified as 5-001) has a maximum heat input capacity greater than 10 MMBtu per hour, it is not subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units (326 IAC 12) because it was constructed prior to June 9, 1989 and has not been modified or reconstructed. Change in ownership is not considered a modification or reconstruction under NSPS rules.

(c) The 30.9 MMBtu per hour wood-fired boiler (identified as 5-001) is not subject to the requirements of 40 CFR 60, Subpart Db - Standards of Performance for Industrial -

Commercial - Institutional Steam Generating Units (326 IAC 12) because it was constructed prior to the June 19, 1984 applicability date and has not been modified or reconstructed.

(d) The 30.9 MMBtu per hour wood-fired boiler (identified as 5-001) is not subject to the requirements of 40 CFR 60, Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for which construction is commenced after September 18, 1978 (326 IAC 12) because this boiler was constructed in 1975 and is not used to generate electricity.

(e) Although constructed after August 17, 1971, the 30.9 MMBtu per hour wood-fired boiler (identified as 5-001) is not subject to 40 CFR 60, Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced after August 17, 1971 (326 IAC 12) because this NSPS applies only to boilers with a heat input rate of more than 250 MMBtu per hour.

(f) The 29.03 MMBtu per hour wood-fired dutch oven boiler is subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because this boiler was constructed after June 9, 1989 and has a heat input capacity greater than 10 MMBtu/hour. The wood fired dutch oven boiler is not subject to 40 CFR 40.43c, Subpart Dc because the boiler has a heat input capacity less than 30 MMBtu per hour. However, it is subject to the reporting requirements in 40 CFR 60.48c(g). As per the reporting requirements, the source must maintain daily records of the amount of fuel combusted. If the source desires to change the timing of the recording of the fuel combusted from daily recording to monthly recording, then the source must send in this request to the following address:

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

This request should reference the NSPS requirement.

(g) The degreasing operation is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning (326 IAC 14)), because only non-halogenated solvents are used for this operation.

(h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

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

The source was constructed prior to August 7, 1977 and is not one (1) of the twenty-eight (28) source categories. At construction, the source was a minor source under PSD. The source was modified in 1983 to add a woodworking shop. After this modification, the potential to emit of PM/PM10 was greater than 250 tons per year. However, this was not identified during the preparation of the TV permit (T181-9293-00041, issued April 19, 2001 to HPA Monon Corporation.) The Construction Permit 181-3416-00016, issued on February 2, 1995, identified HPA Monon Corporation as a major source of VOC under PSD. In 1995, the source was modified to add one (1) 29 MMBtu per hour wood fired boiler, one (1) planer (which was removed from the source in 2003), one (1) wood undercoating booth, and one (1) wood gluing booth. Each of these modifications, except for the wood gluing booth, were major because it

resulted in the potential to emit of PM10, PM, NOx and CO greater than 15, 25, 40 and 100 tons per year, respectively.

Rockland Wood Products, LLC purchased equipment from HPA Monon. It is not one of the twenty-eight (28) source categories. A PSD minor source limit has been added to this permit to specifically address the PM and PM10 emissions. The source will be limited to 4.54 pounds of PM per hour from the woodworking shop. This is equivalent to 19.9 tons of PM per year from the woodworking shop and less than 250 tons per year from the entire source. Compliance with this limit ensures a PSD minor source status. Although the PM10 emissions are greater than 250 tons per year, compliance with 326 IAC 2-8 (FESOP) ensures a PSD minor source status for PM10. All other uncontrolled pollutants are less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is located in White County and the potential to emit of all criteria pollutants after the issuance of this FESOP is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply

326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants (HAPs))

This source was constructed prior to the July 27, 1997 applicability date and is not a major source of Hazardous Air Pollutants (HAPs). Therefore, the source is not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-8-4 (Federally Enforceable State Operating Permit (FESOP))

The potential to emit of PM10, CO and NOx from the entire source are greater than one hundred (100) tons per year. In order to limit the source to less than one hundred (100) tons per year of PM10, CO and NOx, the following limits shall be taken:

(a) The PM10 emissions from the wood working shop (identified as 5-003) shall be limited to 4.54 pounds per hour when the wood working shop is in operation. This limit is equivalent to a PM10 emission limit of 19.9 tons per year.

(b) The maximum amount of wood burned in the two (2) wood-fired boilers (identified as 5-001 and 5-002) shall be limited to 20,600 tons per year combined and the emission rate of PM10, NOx, and CO shall be limited to 0.36, 0.49, and 0.60 lbs per MMBtu heat input.

These limits ensure that PM10, NOx, and CO emissions from the entire source will be less than one hundred (100) tons per year and renders 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable to the source.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Woodworking Shop

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations from Manufacturing Processes), particulate emissions from the woodworking shop shall not exceed 14.1 pounds per hour when

operating at a process weight rate of 12,637 pounds per hour.

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

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

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

The two (2) baghouses shall be in operation and control emissions from the woodworking shop at all times that the woodworking shop is in operation, in order to comply with this rule.

State Rule Applicability - Wood Fired Boilers

326 IAC 4-2 (Incinerators)

The two (2) wood fired boilers (identified as 5-001 and 5-002) are not subject to 326 IAC 4-2 (Incinerators) because these boilers do not burn solid waste, that is, refuse more than 50 % of which consists of a mixture of paper, wood, yard wastes, food wastes, plastics, etc. These boilers burn wood chips generated onsite from the woodworking operations.

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3(a), the PM emissions from the 30 MMBtu per hour wood fired boiler (identified as 5-001) which was existing and in operation before September 21, 1983 shall not exceed the PM emission rate calculated using the following equation:

$$Pt = \frac{(c * a * h)}{(76.5 * Q^{0.75} * N^{0.25})}$$

$$Pt = \frac{(50\ ug/m^3 * 0.67 * 23.5)}{((76.5 * (30)^{0.75} * (1)^{0.25}))}$$

$$Pt = \frac{787}{980} = 0.80\ lbs/MMBtu$$

where

Pt = emission rate limit (lbs/MMBtu)
C = 50 ug/m^3
a = plume rise factor (0.67)
Q = total source heat input capacity rating in million Btu per hour (30 MMBtu/hour)
N = number of stacks
h = stack height (ft)

However, 326 IAC 6-2-3(e) states that boilers constructed after June 8, 1972 shall in no case exceed 0.6 pounds of particulate matter per MMBtu heat input. Since 0.6 pounds per MMBtu is less than the limit calculated using the above equation, the wood fired boiler (identified as 5-001) shall be limited to 0.6 pounds of PM per MMBtu heat input.

326 IAC 6-2-4(Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the 29 MMBtu per hour wood fired boiler (identified as 5-002) which was existing and in operation after September 21, 1983 shall be limited to 0.38 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

$$Pt = \frac{1.09}{(59)^{0.26}} = 0.38 \text{ lbs/MMBtu}$$

where

Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity rating in million Btu per hour (59.0 MMBtu/hour)

State Rule Applicability - Wood Under Coating, Wood Gluing Facilities

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 40 CFR Subpart P, the particulate emissions from the wood undercoating and wood gluing facilities shall be limited by the following:

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

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

Under the rule revision, particulate from the wood undercoating facility shall be controlled by a dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications. The particulate emissions from the wood gluing operation are negligible.

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

Although constructed after January 1, 1980, the wood gluing and wood undercoating facilities are not subject to the requirements of 326 IAC 8-1-6 because the potential emissions of VOC from each operation is less than twenty-five (25) tons per year.

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

Although constructed after July 1, 1990 applicability date for this rule, the wood gluing and wood under coating facilities are not subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because the source does not coat wood furnishings as described in 8-2-12(a).

326 IAC 8-6-1(Organic Solvent Emission Limitations)

This source is not subject to the provisions of 326 IAC 8-6-1(Organic Solvent Emission Limitations) because the source is not located in Lake or Marion County and does not have a potential to emit of VOC greater than one hundred (100) tons per year.

State Rule Applicability - Degreasing Operations

326 IAC 8-3 (Organic Solvent Degreasing Operation)

The degreasing operations are subject to the requirements of 326 IAC 8-3-2(Cold Cleaner Operations) because the degreaser existed after January 1, 1980 (326 IAC 8-3-1(a)(2).

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

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasing operation is not subject to 326 IAC 8-3-5 because this facility was constructed prior to July 1, 1990 (see 326 IAC 8-3-1(b)(2)).

State Rule Applicability - Petroleum and Gasoline Dispensing Facilities

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

The petroleum, other than gasoline, dispensing facility, and gasoline transfer and dispensing operation, each does not have potential emissions of VOC equal to or greater than twenty five (25) tons per year. Therefore, these units are not subject to the provisions of 326 IAC 8-1-6.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

This source is not subject to the provisions of 326 IAC 8-4-6 (Gasoline Dispensing Facility) because the source dispenses less than 10,000 gallons of gasoline per month and was existing prior to July 1, 1989.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

This source is not subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because the tank's storage capacity is less than 39,000 gallons.

State Rule Applicability - Insignificant Activities

There are no specifically applicable regulations that apply to these emission units.

Testing Requirements

(a) The Permittee shall perform PM10 testing for the two (2) baghouse controlling particulate emissions from the woodworking shop (identified as 5-003), utilizing methods as approved by the Commissioner to document compliance with 326 IAC 2-8 (FESOP). This test shall be repeated at least once every five years from the date of the last valid compliance demonstration. PM-10 includes filterable and condensible PM-10.

This stack testing is required because the woodworking shop is responsible for almost all of the PM10 emissions from this source. The two (2) baghouses must operate correctly in order for the source to comply with 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

(b) Testing is not required for the two (2) wood fired boilers because the emission rate in pounds of pollutant per MMBtu are based on AP-42, Chapter 1.6 (Wood Residue Combustion), Table 1.6-1, 1.6-2, and 1.6-3 (March, 2002).

Compliance Requirements

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

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

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

1. The two (2) wood fired boilers (identified as 5-001 and 5-002), have applicable compliance monitoring conditions as specified below:

   (a) Once per shift visible emissions notations of the two (2) wood fired boilers (identified as 5-001 and 5-002) stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

   (b) An inspection shall be performed each calendar quarter of the multi-cyclone collector controlling the wood fired dutch oven boiler (identified as 5-002). Inspections required by this condition shall not be performed in consecutive months.

   (c) In the event that cyclone failure has been observed:

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

These monitoring conditions for the two (2) wood fired boilers (identified as 5-001 and 5-002) are necessary to ensure compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating).

2. The wood working shop (identified as 5-003) has applicable compliance monitoring conditions specified below:

(a) Daily visible emission notations of the two (2) baghouses stack exhaust controlling the wood working shop shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(c) In the event that bag failure has been observed:

(A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse’s pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

These monitoring conditions for the woodworking shop (identified as 5-003) are necessary to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations from Manufacturing Processes), 326 IAC 2-8-4 (FESOP), and 326 IAC 2-2 (PSD).

3. The wood under coating booth has applicable compliance monitoring conditions specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the under coating booth stack while the under coating booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions for the wood undercoating facility are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations).

Conclusion

The operation of this laminate flooring manufacturing plant shall be subject to the conditions of the attached FESOP No. F181-16784-00041.

Appendix A: Emission Calculations
Woodworking Shop (Identified as 5-003)

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

*PM/PM10 Control Equipment = Two(2) Baghouses		PTE PM/PM10 (ton/year)	After Control (lbs/hour)	PTE PM/PM10 Before Control (tons/year)
Outlet grain loading (grains/acf) =	0.0078	19.9	4.55	1993
Air flow rate (acfm) =	68050			
Control Efficiency (%) =	99%			

* Assume PM emissions are equal to PM10

Methodology

PTE After Control:

PTE PM/PM10 (lbs/hour) = Grain Loading (gr/acf) * Air Flow Rate (acf/min) * 60 min/hour * 1 lb/7000grains

PTE PM/PM10 (ton/year) = Grain loading (gr/acf) * Air flow rate (acf/min) * 60 minute/hour * 1lb/7000 grains * 8760 hours/year * 1ton/2000 lbs

PTE Before Control:

PTE PM/PM10 (ton/year) = Grain loading (gr/acf) * Air flow rate (acf/min) * 60 minute/hour * 1lb/7000 grains * 8760 hours/year * 1ton/2000 lbs * 1/(1-Control Efficiency %)

Appendix A: Emission Calculations
VOC and HAP Emissions from Wood Gluing
(Identified as 5-012)

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

Material	Max. Usage Rate (lb/hr)	VOC Content (%)	*PTE VOC (tons/year)
MU-400 Resin	59.40	0.7%	**1.82**

* Assume all VOC emission is Formaldehyde

Material	Actual. Usage (lb/yr)	NH_4Cl Content (%)	Usage Rate NH_4Cl (lb/yr)	M.W NH_4Cl	M.W NH_3	PTE NH_3 (tons/yr)	M.W HCl	PTE HCl (ton/year)
CT-125	33444	17%	5685	53.5	17	1.69	36.5	**3.62**

Methodology
PTE VOC (tons/year) = Max. Usage Rate (lb/hour) * VOC Content (%) * 8760 hours/year * 1ton/2000 lbs
Usage Rate NH_4Cl (lb/year) = Actual Usage (lb/yr) * NH4Cl (%)
PTE NH_3 (tons/year) = Mol.Wt NH3 * 1/Mol. Wt NH4Cl * Usage Rate NH4Cl (lb/yr) * 1ton/2000 lbs * 8760 hours/yr *1/4692 hours of operation
PTE HCl (tons/year) = Mol. Wt HCl * 1/Mol.Wt NH4Cl * Usage Rate NH4Cl (lb/yr) * 1ton/2000 lbs * 8760 hours/yr * 1/ 4692 hours of operation

Appendix A: Emission Calculations
Under Coating Booth

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

Material	Density (lbs/gal)	VOC Content (lb/gal)	Maximum Usage Rate (gal/hour)	Potential VOC (lbs/hour)	Potential VOC (lbs/day)	PTE VOC (tons/year)	Weight % Solids	*PTE PM/PM10 (ton/year)	**Transfer Efficiency	***PTE PM/PM10 After Control (ton/year)
WLA-0038 (1 gun)	10.4	0.05	14.3	0.72	17.2	3.14	41.1%	94.2	65%	4.71
WLA-0038 (2 guns)	10.4	0.05	21.5	1.08	25.8	4.71	41.1%	141	65%	7.07
						7.85		**235**		**11.8**

* Assume PM emissions are equal to PM10.
** Material applied using three (3) airless pressure pot guns
***The PM emissions are controlled by dry filters with a control efficiency of 95%
Note: There are no HAP emissions in the coating applied

METHODOLOGY

PTE Before Control

PTE VOC (lbs/hour) = VOC Content (lb/gal) * Maximum Usage Rate (gal/hour)
PTE VOC (lbs/day) =Max. Usage Rate (gal/hour) * VOC Content (lbs/gal) * (24 hr/day)
PTE VOC (tons/year) = VOC Content (lb/gal) * Maximum Usage Rate (gal/hour) * 8760 hour/year * 1 ton/2000 lbs
PTE PM/PM10 (tons/year) = Density (lb/gal) * Max Usage (gal/hour) * Weight % Solids * 8760 hours/yr * 1ton/2000lbs * (1-Transfer Efficiency %)

PTE After Control

PTE PM/PM10 (tons/year) = Density (lb/gal) * Max Usage (gal/hour) * Weight % Solids * 8760 hours/yr * 1ton/2000lbs * (1-Transfer Efficiency %) *(1-Control Efficiency %)

Appendix A: Emission Calculations
Particulate Emissions
From Planer
(Identified as 5-004)

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

		After Control		Before Control
		PTE PM/PM10		PTE PM/PM10
*PM/PM10 Control Equipment = Baghouse (5-004)		(tons/year)	(lbs/hour)	(tons/year)
Outlet grain loading (grains/acf) =	0.002	0.19	0.044	19.1
Air flow rate (acfm) =	2311			
Control Efficiency (%) =	99%			

* Assume PM10 emissions equal PM emissions

Methodology

PTE After Control

PTE PM/PM10 (lbs/hour) = 0.004 gr/acf * 3400 acf/min * 60 min/hour * 1 lb/7000grains

PTE PM/PM10 (ton/year) = Grain loading (gr/acf) * Air flow rate (acf/min) * 60 minute/hour * 1lb/7000 grains * 8760 hours/year * 1ton/2000 lbs

PTE Before Control

PTE PM/PM10 (ton/year) = Grain loading (gr/acf) * Air flow rate (acf/min) * 60 minute/hour * 1lb/7000 grains * 8760 hours/year * 1ton/2000 lbs * 1/(1-Control Efficiency %)

Appendix A: Emissions Calculations
Dutch Oven Boiler
Dry Wood Waste Combustion
(Identified as 5-002)

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

Heat Input Capacity (MMBtu/hr) 29.03

	Pollutant					
	PM	**PM10**	**SO_2**	**NOx**	**VOC**	**CO**
*Emission Factor (lb/MMBtu)	0.40	0.36	0.025	0.49	0.01	0.60
Potential To Emit (tons/year)	50.9	45.8	3.18	62.3	1.65	76.3

*Emission Factors are from AP-42 Chapter 1.6 (Wood Residue Combustion Boilers), Tables 1.6-1, 1.6-2 and 1.6-3 (March, 2002).
Note: Rockland burns only dry wood (less than 20% moisture content) in this boiler.

METHODOLGY

PTE (tons/year) = Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760hours/year * 1ton/2000 lbs

Appendix A: Emissions Calculations
Stoker Boiler
Dry Wood Waste Combustion
(Identified as 5-001)

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

Heat Input Capacity (MMBtu/hr) 30.90

	Pollutant					
	PM	**PM10**	**SO_2**	**NOx**	**VOC**	**CO**
*Emission Factor (lb/MMBtu)	0.40	0.36	0.03	0.49	0.01	0.60
Potential To Emit (tons/year)	54.1	48.7	3.4	66.3	1.76	81.2

*Emission Factors are from AP-42 Chapter 1.6 (Wood Residue Combustion Boilers), Tables 1.6-1, 1.6-2 and 1.6-3 (March 2002).
Note: Rockland burns only dry wood (less than 20% moisture content) in this boiler.

METHODOLGY

PTE (tons/year) = Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760hours/year * 1ton/2000 lbs

Appendix A: Emissions Calculations
HAP Emissions
Fom Dry Wood Waste Combustion
(Identified as 5-001 and 5-002)

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

Capacity (MMBtu/hr) 59.9

	Selected Hazardous Air Pollutants				
	Acrolein	**Benzene**	**Formaldehyde**	**Hydrogen Chloride**	**Styrene**
Emission Factor (lb/MMBtu)	0.004	0.004	0.004	0.019	0.002
Potential To Emit (tons/year)	1.05	1.10	1.15	4.99	0.50

* Emission factors are from AP-42, Chapter 1.6 (Wood Residue Combustion Boilers), Table 1.6-1, 1.6-2, and 1.6-3 (March, 2002).
These factors include the five (5) HAPs with the highest AP-42 emission factors.
Note: Rockland burns only dry wood (less than 20 weight % moisture) in this boiler.

METHODOLGY
PTE (tons/year) = Capacity (MMBtu/hour) * Emission Factor (lb/MMBtu) * 8760hour/year * 1ton/2000lbs

Appendix A: Emissions Calculations
Dutch Oven and Bigelow Wood Fired Boilers
Dry Wood Waste Combustion
(Identified as 5-001 and 5-002)

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

POTENTIAL TO EMIT IN TONS PER YEAR AFTER A LIMIT ON THE AMOUNT OF WOOD BURNED

	Pollutant						
	PM	**PM10**	**SO_2**	**NOx**	**VOC**	**CO**	**HCl**
Emission Factor in lb/MMBtu	0.40	0.36	0.025	0.49	0.013	0.6	0.019
**Potential To Emit (tons/year)	48.0	43.2	3.00	58.8	1.56	72.0	2.28

* Emission factors are from AP-42, Chapter 1.6 (Wood Residue Combustion Boilers), Table 1.6-1, 1.6-2, and 1.6-3 (March, 2002).
Note: Rockland burns only dry wood (less than 20% moisture content) in this boiler.
PTE for wood fired boilers is limited to 15,000 tons of wood burned per twelve consecutive month period.

METHODOLGY

PTE (tons/year) = Wood Burned (tons/yr) * Emission Factor (lbs/MMBtu) *1MMBtu/10^6Btu * 8000 Btu/lb (heating value of dry wood burned)

Appendix A: Emissions Calculations
Summary Emissions

Company Name: Rockland Wood Products
Address: 8089 North, 200 West, Monon, Indiana 47959
FESOP: 181-16784
Plt ID: 181-00041
Reviewer: ERG/SD
Date: May 7, 2003

POTENTIAL TO EMIT BEFORE CONTROLS

Emission Units	PM	PM10	SO_2	NOx	VOC	CO
Woodworking Shop (5-003)	1993	1993				
Wood Gluing (5-012)					1.82	
Wood Undercoating	235	235			7.85	
Planer (5-004)	19.1	19.1				
Wood Fired Boiler (5-002)	50.9	45.8	3.18	62.3	1.65	76.3
Wood Fired Boiler (5-001)	54.1	48.7	3.38	66.3	1.76	81.2
SUM	2352	2342	6.56	129	13.1	157

POTENTIAL TO EMIT AFTER CONTROLS AND A LIMIT ON AMOUNT OF WOOD BURNED

Emission Units	PM	PM10	SO_2	NOx	VOC	CO
Woodworking Shop (5-003)	19.9	19.9				
Wood Gluing (5-012)					1.82	
Wood Undercoating	11.8	11.8			7.85	
Planer (5-004)	19.1	19.1				
Wood Fired Boiler (5-002 and 5001)	48.0	43.2	3.00	58.8	1.56	72.0
SUM	98.8	94.0	3.00	58.8	11.2	72.0