

March 1, 2005



Sally Sands
Miller Veneers, Inc.
P.O. Box 18179
Indianapolis, Indiana 46201

Re: Registered Construction and Operation
Status, 097-19201-00146

Dear Ms. Sands:

The application from Miller Veneers, Inc., received on April 8, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following veneer manufacturing operation, located at 3724 East 13th Street, is classified as registered:

- (a) One (1) boiler, fired by natural gas and wood, with a maximum heat input capacity of nine (9) million Btu per hour (MMBtu/hr), installed in 1991, using no control, and exhausting to the atmosphere.

The following conditions shall be applicable:

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:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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 15 minutes (60 readings) in a 6-hour period 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.

Pursuant to 326 IAC 6-2-4 (Particulate Matter Limitations for Sources of Indirect Heating), particulate emissions from indirect heating facilities shall be limited by the following equation:

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

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
mBtu/hr) heat input.

For Q less than 10 mm Btu per hour (mmBtu/hr), Pt shall not exceed 0.60. Therefore, particulate matter emissions from the boiler shall not exceed 0.6 pounds per million Btu (lbs/mm Btu).

This registration is issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

no later than March 1 of each year, with the annual notice being submitted in the format attached. An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez
Administrator

aco

cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	Miller Veneers, Inc.
Address:	3724 East 13th Street
City:	Indianapolis, Indiana 46201
Authorized individual:	Sally Sands
Phone #:	(317) 638-2326
Registration #:	097-19201-00146

I hereby certify that Miller Veneers, Inc. is still in operation and is in compliance with the requirements of Registration 097-19201-00146.

Name (typed):
Title:
Signature:
Date:

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Miller Veneers, Inc.
Source Location: 3724 East 13th Street, Indianapolis, Indiana 46201
County: Marion
SIC Code: 2499
Operation Permit No.: 097-19201-00146
Permit Reviewer: Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Miller Veneers, Inc. relating to a veneer manufacturing operation.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) boiler, fired by natural gas and wood, with a maximum heat input capacity of nine (9) million Btu per hour (MMBtu/hr), installed in 1991, using no control, and exhausting to the atmosphere.

Existing Approvals

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

OP 146-01, issued on March 26, 1997.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

- (a) IDEM, OAQ and OES are aware that the source has been operating under an expired permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM, OAQ and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Recommendation

The staff recommends to the Administrator that the operation 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 application for the purposes of amending the Annual Emission Statement applicability to the source was received on April 8, 2004. Upon further review, it was determined that the source was operating with an expired operating permit. To bring the source into compliance with current permitting rules, this registration is issued.

Emission Calculations

See Appendix A (three pages) of this document for detailed emissions calculations.

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	22.1
PM-10	20.4
SO ₂	1.0
VOC	0.5
CO	23.6
NO _x	8.7

HAP	Potential To Emit (tons/year)
Hydrogen Chloride	0.75
Benzene	0.17
Acrolein	0.16
Formaldehyde	0.17
Combination of HAPs	1.40

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of particulate is equal to or greater than five (5) tons per year and less than twenty-five (25) tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is registered and subject to the provisions of 326 IAC 2-5.1-2.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions for all emissions units from the source. This information reflects the 2001 OES emission data.

Pollutant	Actual Emissions (tons/year)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	Negligible
CO	Negligible
NO _x	Negligible
HAP	Negligible

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 1-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential To Emit (tons/year)
PM	22.1
PM-10	20.4
SO ₂	1.0
VOC	0.5
CO	23.6
NO _x	8.7
Single HAP	0.75
Combination of HAPs	1.4

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons or greater per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) incorporated into this permit. Steam generating units that have a maximum design heat input capacity of less than ten (10) million Btu per hour (10 mm Btu/hr) are not subject to 40 CFR Part 60 Subpart Dc. This source has no steam generating units with a maximum design heat input capacity of greater than ten (10) million Btu per hour (Btu/hr). Therefore, this source is not subject to 40 CRF Part 60 Subpart Dc.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) incorporated into this permit. National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, does not apply to this source because it is not a major source of HAPs.

State Rule Applicability

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not a major source under nonattainment NSR because it has the potential to emit less than 100 tons of NO_x and less than 100 tons of VOC per year.

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

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

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

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

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 thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-1(Nonattainment Area Limitations)

This rule does not apply to this source because actual emissions of particulate are less than ten (10) tons per year, and the potential to emit of particulate is less than one hundred (100) tons per year, and it is not a specifically listed source in 326 IAC 6.

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

The boiler is subject to the provisions of 326 IAC 6-2-1(d) because it is located in Marion County and was constructed after September 21, 1983. Particulate emissions from indirect heating facilities shall be limited by the following equation:

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

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
mBtu/hr) heat input.

For Q less than 10 mm Btu per hour (mmBtu/hr), Pt shall not exceed 0.60. Total source maximum operating capacity is less than 10 million Btu per hour (mmBtu/hr). Therefore, particulate matter emissions from the boiler shall not exceed 0.6 pounds per million Btu (lbs/mm Btu).

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit of each individual unit has the potential to emit less than 25 tons per year or 10 pounds per hour of Sulfur Dioxide.

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

The Permittee has no individual facility with the potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

Conclusion

This veneer manufacturing operation shall be subject to the conditions of the attached Registration 097-19201-00146.

**Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Bark/Bark and Wet Wood**

Company Name: Miller Veneers, Inc.
Address City IN Zip: 3724 East 13th Street, Indianapolis, Indiana 46201
CP: 097-19201-00146
Reviewer: Angelique Oligier
Date: November 9, 2004

Capacity (MMBtu/hr) 9

Emission Factor in lb/MMBtu	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
	0.56	0.517	0.447	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	22.0752	20.38014	17.62074	0.9855	8.6724	0.51246	23.652

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

*The PM10 and PM2.5 emission factors include the condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

$$\text{Heat Input Capacity (MMBtu/hr)} = \text{Capacity (tons/hr)} \times \text{Higher Heating Value of wood fuel (Btu/lb)} \times (1 \text{ MMBtu}/10^6 \text{ Btu}) \times 2000 \text{ lbs}/1 \text{ ton}$$

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

$$\text{Emissions (tons/yr)} = \text{Capacity (MMBtu/hr)} \times \text{Emission Factor (lb/MMBtu)} \times 8760\text{hrs/yr} \times 1\text{ton}/2000\text{lbs}$$

**Appendix A: HAPs Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
All Wood Waste Fuel Types**

Company Name: Miller Veneers, Inc.
Address City IN Zip: 3724 East 13th Street, Indianapolis, Indiana 46201
CP: 097-19201-00146
Reviewer: Angelique Oliger
Date: November 9, 2004

Capacity (MMBtu/hr) 9

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emissions in tons/yr	1.6E-01	1.7E-01	1.7E-01	7.5E-01	7.5E-02

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

$$\text{Heat Input Capacity (MMBtu/hr)} = \text{Capacity (tons/hr)} \times \text{Higher Heating Value of wood fuel (Btu/lb)} \times (1 \text{ MMBtu}/10^6 \text{ Btu}) \times 2000 \text{ lbs/1 ton}$$

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

$$\text{Emissions (tons/yr)} = \text{Capacity (MMBtu/hr)} \times \text{Emission Factor (lb/MMBtu)} \times 8760\text{hrs/yr} \times 1\text{ton}/2000\text{lbs}$$

These factors include the five HAPs with the highest AP-42 emission factors.