



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: September 20, 2005  
RE: B.L. Curry and Sons / 043-19407-00006  
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 1/10/05



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**B. L. Curry & Sons, Inc.**  
**1014 East 6<sup>th</sup> Street**  
**New Albany, Indiana 47150**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 043-19407-00006	
Issued by: Original Signed By: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 20, 2005  Expiration Date: September 20, 2010

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary wood veneer manufacturing source.

Authorized Individual:	Plant Manager
Source Address:	1014 East 6 <sup>th</sup> Street, New Albany, Indiana 47150
Mailing Address:	1014 East 6 <sup>th</sup> Street, New Albany, Indiana 47150
General Source Phone:	(812) 945-6623
SIC Code:	2435
County Location:	Floyd
Source Location Status:	Nonattainment area for PM <sub>2.5</sub> and Ozone under the 8-hour standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Emission Offset Rules

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Woodworking operations, processing a maximum of 85 logs per day weighing no more than 800 pounds per log (equivalent to a maximum capacity of 4.25 tons per hour), consisting of the following:
  - (1) One (1) debarking and end cutting process, identified as EU-Morbark, constructed in 1964, with all scrap going into a Hammer Hog, identified as EU-Montgomery Hammer Hog. The Montgomery Hammer Hog has an input capacity of 12,000 pounds per hour.
  - (2) One (1) saw mill, identified as EU-Salem Saw Mill, where logs are cut in half lengthwise, constructed in 1988.
  - (3) One (1) chipper hog, identified as EU-Morbark, constructed in 1971, capacity: 200 yards of wood per hour.
  - (4) One (1) vat area consisting of a log soaking process with negligible emissions.
  - (5) One (1) veneering operation with negligible emissions.
  - (6) One (1) trimming operation, with waste going to one (1) Capital Veneer Hog, identified as EU-No. 1, constructed in 1954. The Capital Veneer Hog has an input capacity of 1,400 pounds of wood veneer per hour. The trimming operation consists of the following:
    - (A) One (1) Capital machine slicer, constructed in 1936;
    - (B) One (1) Capital machine slicer, constructed in 1980; and

- (C) One (1) Capital half round, constructed in 1920.
- (7) One (1) veneer drying room with no emissions.
- (8) One (1) veneer clipping line, identified as EU-Cremona clipping line, constructed in 1965, with all waste going to one (1) Capital Veneer Hog, identified as EU-No. 2. The Capital Veneer Hog has an input capacity of 1,400 pounds of wood veneer per hour.
- (b) One (1) wood waste-fired boiler, identified as EU-Erie City Wood Boiler, constructed in 1976, obtaining wood via pipe and cyclone from all four (4) hogs, exhausting through the Wood Boiler Stack, input capacity: 11.7 million British thermal units and 1.362 tons of wood per hour.
- (c) One (1) natural gas-fired boiler, identified as EU-York Shipley, constructed in 1976, exhausting through the Gas Boiler Stack, capacity: 6.15 million British thermal units per hour.
- (d) Unpaved roads.

**SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

**B.1 Permit No Defense [IC 13]**

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

**B.2 Definitions**

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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 2-1.1-1 shall prevail.

**B.3 Effective Date of the Permit [IC13-15-5-3]**

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

**B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]**

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

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

**B.5 Modification to Permit [326 IAC 2]**

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

**B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204

(d) The notification 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.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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 (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (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  
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by an "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 PMP's 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 PMP 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 an "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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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  
Indianapolis, Indiana 46204

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2] [IC 13-30-3-1]**

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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 permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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.

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

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

B.12 Credible Evidence [326 IAC 1-1-6]

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

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (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 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

**C.5 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

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

### Testing Requirements

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (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 the IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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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

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

C.11 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and 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, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification 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) 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.12 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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 emissions unit 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 re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

**Record Keeping and Reporting Requirements**

**C.13 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (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 when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [IC 13-14-1-13]

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- (a) 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  
Indianapolis, Indiana 46204

- (b) 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.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**SECTION D.1**

**EMISSIONS UNITS OPERATION CONDITIONS**

**Emissions Unit Description: Woodworking**

- (a) Woodworking operations, processing a maximum of 85 logs per day weighing no more than 800 pounds per log (equivalent to a maximum capacity of 4.25 tons per hour), consisting of the following:
- (1) One (1) debarking and end cutting process, identified as EU-Morbark, constructed in 1964, with all scrap going into a Hammer Hog, identified as EU-Montgomery Hammer Hog. The Montgomery Hammer Hog has an input capacity of 12,000 pounds per hour.
  - (2) One (1) saw mill, identified as EU-Salem Saw Mill, where logs are cut in half lengthwise, constructed in 1988.
  - (3) One (1) chipper hog, identified as EU-Morbark, constructed in 1971, capacity: 200 yards of wood per hour.
  - (4) One (1) vat area consisting of a log soaking process with negligible emissions.
  - (5) One (1) veneering operation with negligible emissions.
  - (6) One (1) trimming operation, with waste going to one (1) Capital Veneer Hog, identified as EU-No. 1, constructed in 1954. The Capital Veneer Hog has an input capacity of 1,400 pounds of wood veneer per hour. The trimming operation consists of the following:
    - (A) One (1) Capital machine slicer, constructed in 1936;
    - (B) One (1) Capital machine slicer, constructed in 1980; and
    - (C) One (1) Capital half round, constructed in 1920.
  - (7) One (1) veneer drying room with no emissions.
  - (8) One (1) veneer clipping line, identified as EU-Cremona clipping line, constructed in 1965, with all waste going to one (1) Capital Veneer Hog, identified as EU-No. 2. The Capital Veneer Hog has an input capacity of 1,400 pounds of wood veneer per hour.

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

**Emission Limitations and Standards**

**D.1.1 Particulate [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the sawmill, identified as EU-Salem Saw Mill, shall not exceed 10.8 pounds per hour when operating at a process weight rate of 4.25 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimming operation shall not exceed 10.8 pounds per hour when operating at a process weight rate of 4.25 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Proc-

esses), the allowable particulate emission rate from the veneer clipping shall not exceed 10.8 pounds per hour when operating at a process weight rate of 4.25 tons 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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Boilers

- (b) One (1) wood waste-fired boiler, identified as EU-Erie City Wood Boiler, constructed in 1976, obtaining wood via pipe and cyclone from all four (4) hogs, exhausting through the Wood Boiler Stack, input capacity: 11.7 million British thermal units and 1.362 tons of wood per hour.
- (c) One (1) natural gas-fired boiler, identified as EU-York Shipley, constructed in 1976, exhausting through the Gas Boiler Stack, capacity: 6.15 million British thermal units per hour.

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

### Emission Limitations and Standards

#### D.2.1 Particulate [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the wood waste-fired boiler, identified as EU-Erie City Wood Boiler, with a heat input capacity of 11.7 million British thermal units per hour shall be limited to 0.6 pounds per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the natural gas-fired boiler, identified as EU-York Shipley, with a heat input capacity of 6.15 million British thermal units per hour shall be limited to 0.6 pounds per million British thermal units heat input.
- (c) 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)), particulate emissions from any facility used for indirect heating purposes which has 250 million British thermal units heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per million British thermal unit heat input.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of the wood waste-fired boiler stack (Wood Boiler Stack) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

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

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.2.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the wood waste-fired boiler stack exhaust once per day.
- (b) To document compliance with Condition D.2.2 the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>B.L. Curry &amp; Sons, Inc.</b>
<b>Address:</b>	<b>1014 East 6<sup>th</sup> Street</b>
<b>City:</b>	<b>New Albany</b>
<b>Phone #:</b>	<b>(812) 945-6623</b>
<b>MSOP #:</b>	<b>043-19407-00006</b>

I hereby certify that B. L. Curry & Sons, Inc. is  still in operation.  
 no longer in operation.

I hereby certify that B.L. Curry & Sons, Inc. is  in compliance with the requirements of MSOP 043-19407-00006.  
 not in compliance with the requirements of MSOP 043-19407-00006.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Minor Source Operating Permit

**Source Background and Description**

**Source Name:** B. L. Curry & Sons, Inc.  
**Source Location:** 1014 East 6<sup>th</sup> Street, New Albany, IN 47150  
**County:** Floyd  
**SIC Code:** 2435  
**Operation Permit No.:** 043-19407-00006  
**Permit Reviewer:** CarrieAnn Paukowits/MES

The Office of Air Quality (OAQ) has reviewed an application from B. L. Curry & Sons, Inc. relating to the operation of a wood veneer manufacturing source.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Woodworking operations, processing a maximum of 85 logs per day weighing no more than 800 pounds per log (equivalent to a maximum capacity of 4.25 tons per hour), consisting of the following:
- (1) One (1) debarking and end cutting process, identified as EU-Morbark, constructed in 1964, with all scrap going into a Hammer Hog, identified as EU-Montgomery Hammer Hog. The Montgomery Hammer Hog has an input capacity of 12,000 pounds per hour.
  - (2) One (1) saw mill, identified as EU-Salem Saw Mill, where logs are cut in half lengthwise, constructed in 1988.
  - (3) One (1) chipper hog, identified as EU-Morbark, constructed in 1971, capacity: 200 yards of wood per hour.
  - (4) One (1) vat area consisting of a log soaking process with negligible emissions.
  - (5) One (1) veneering operation with negligible emissions.
  - (6) One (1) trimming operation, with waste going to one (1) Capital Veneer Hog, identified as EU-No. 1, constructed in 1954. The Capital Veneer Hog has an input capacity of 1,400 pounds of wood veneer per hour. The trimming operation consists of the following:
    - (A) One (1) Capital machine slicer, constructed in 1936;
    - (B) One (1) Capital machine slicer, constructed in 1980; and
    - (C) One (1) Capital half round, constructed in 1920.
  - (7) One (1) veneer drying room with no emissions.
  - (8) One (1) veneer clipping line, identified as EU-Cremona clipping line, constructed in 1965, with all waste going to one (1) Capital Veneer Hog, identified as EU-No.

2. The Capital Veneer Hog has an input capacity of 1,400 pounds of wood veneer per hour.

- (b) One (1) wood waste-fired boiler, identified as EU-Erie City Wood Boiler, constructed in 1976, obtaining wood via pipe and cyclone from all four (4) hogs, exhausting through the Wood Boiler Stack, input capacity: 11.7 million British thermal units and 1.362 tons of wood per hour.
- (c) One (1) natural gas-fired boiler, identified as EU-York Shipley, constructed in 1976, exhausting through the Gas Boiler Stack, capacity: 6.15 million British thermal units per hour.
- (d) Unpaved roads.

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

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

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

There are no new emission units proposed at this time.

### **Existing Approvals**

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

OP 22-07-93-0103, issued on April 19, 1990

All conditions from previous approvals were incorporated into this permit except the following:

- (a) Condition 4: That particulate matter emissions from the wood fired boiler shall be limited to 0.8 pounds per million British thermal unit pursuant to 326 IAC 6-2-3.

Reason not incorporated: Pursuant to 326 IAC 6-2-3(e), "Particulate emissions from any facility used for indirect heating purposes which has 250 mmBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/mmBtu heat input."

- (b) Condition 5(a): That the particulate matter emissions from the woodworking facilities shall be considered in compliance with 326 IAC 6 provided that visible emissions do not exceed 10% opacity.

Reason not incorporated: There is no basis for the opacity limitation. The woodworking facilities must comply with 326 IAC 5-1, as well as 326 IAC 6-3-2. However, there are no specific visible emissions notations requirements for the woodworking facilities.

- (c) Condition 5(c): That the particulate matter emissions from the woodworking facilities shall be considered in compliance with 326 IAC 6 provided that no public nuisance is created.

Reason not incorporated: There is no basis for this requirement. The woodworking facilities must comply with 326 IAC 5-1, as well as 326 IAC 6-3-2. However, there are no specific visible emissions notations requirements for the woodworking facilities.

### Enforcement Issue

- (a) The Operation Permit for this source expired on July 1, 1993, and the applicant applied for the Minor Source Operating Permit (MSOP) after December 27, 1999. Therefore, the source is not in compliance with the compliance schedule under 326 IAC 2-6.1-3.
- (b) A Notice of Violation was sent to the applicant on June 29, 2004, requesting the application resulting in this review.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Wood Boiler Stack	Wood-fired boiler	45.0	4.0	6,000	Ambient
Gas Boiler Stack	Natural gas-fired boiler	65.0	1.5	16,200	Ambient

### Recommendation

The staff recommends to the Commissioner 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 this review was received on July 26, 2004, with additional information received on October 26, 2004.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6). The emissions calculations for the woodworking facilities are conservative because they are based on operating at the estimated maximum capacity for 8,760 hours per year, rather than the daily capacity for 365 days per year. The hourly capacity was computed by dividing the daily capacity by the operating hours and multiplying by a factor of two (see page 1 of 6 of TSD Appendix A).

### Potential to Emit of the Source Before Controls

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.”

<b>Pollutant</b>	<b>Potential to Emit (tons/yr)</b>
PM	102
PM <sub>10</sub>	54.6
SO <sub>2</sub>	1.30
VOC	0.814
CO	33.0
NO <sub>x</sub>	14.0

<b>HAPs</b>	<b>Potential to Emit (tons/yr)</b>
Acrolein	0.205
Benzene	0.215
Formaldehyde	0.227
Hydrogen Chloride	0.974
Styrene	0.097
Dichlorobenzene	Negligible
Hexane	0.049
Toluene	Negligible
Lead	Negligible
Cadmium	Negligible
Chromium	Negligible
Manganese	Negligible
Nickel	Negligible
Total	1.77

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM<sub>10</sub> is greater than 25 tons per year and the potential to emit of PM<sub>10</sub> is less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (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 of HAPs is less than twenty-five (25) tons per year. Therefore, this source is not subject to 326 IAC 2-7, Part 70.

- (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.

### County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM <sub>2.5</sub>	Nonattainment
PM <sub>10</sub>	Unclassifiable
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset.
- (b) U.S.EPA, in Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Floyd County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions pursuant to the Nonattainment New Source Review requirements.
- (c) Floyd County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

## 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	Emissions (tons/yr)
PM	102
PM <sub>10</sub>	54.6
SO <sub>2</sub>	1.30
VOC	0.814
CO	33.0
NO <sub>x</sub>	14.0
Single HAP	0.974
Combination HAPs	1.77

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater, no nonattainment regulated pollutant is emitted at a rate of one-hundred (100) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.
- (b) Emissions are the unrestricted potential to emit of the source.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

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

- (a) criteria pollutant is less than one-hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) the combination of HAPs is less than twenty-five (25) tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

## Federal Rule Applicability

- (a) The boilers at this source each have a capacity less than 250 million British thermal units per hour. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971) are not included in the permit for this source.
- (b) The boilers at this source were constructed prior to September 18, 1978. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978), are not included in the permit for this source.

- (c) The boilers at this source each have a capacity less than 100 million British thermal units per hour. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), are not included in the permit for this source.
- (d) The boilers at this source were constructed before June 9, 1989. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), are not included in the permit for this source.
- (e) The wood boiler was manufactured prior to July 1, 1988. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart AAA (Standards of Performance for New Residential Wood Heaters), are not included in the permit for this source.
- (f) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDD (National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products), are not included in the permit for this source.
- (g) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters), are not included in the permit for this source.

#### **State Rule Applicability – Entire Source**

##### **326 IAC 2-3 (Emission Offset)**

- (a) The unrestricted potential VOC emissions and the unrestricted potential NO<sub>x</sub> emissions are each less than one-hundred (100) tons per year. Therefore, the potential to emit VOC and the potential to emit NO<sub>x</sub> are less than 100 tons per year, and this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.
- (b) According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM<sub>2.5</sub> Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM<sub>2.5</sub> major New Source Review regulations, states should assume that a major stationary source’s PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions. IDEM will use the PM<sub>10</sub> nonattainment major New Source Review program as a surrogate to address the requirements of nonattainment major New Source Review for the PM<sub>2.5</sub> NAAQS. The unrestricted potential PM<sub>10</sub> emissions, are less than one-hundred (100) tons per year. Therefore, the potential to emit PM<sub>2.5</sub> is less than one-hundred (100) tons per year, and this source is not a major source of PM<sub>2.5</sub>.

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

The unrestricted potential emissions of each attainment criteria pollutant are less than two-hundred fifty (250) tons per year. Therefore, the potential to emit each attainment criteria pollutant is less than 250 tons per year, and this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

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

The operation of this veneer manufacturing source emits less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO<sub>x</sub>, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

#### 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 the permit:

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

#### 326 IAC 6-4 (Fugitive Dust Emissions)

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

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

This source, located in Floyd County, was in operation prior to December 13, 1985. Therefore, the requirements of 326 IAC 6-5 are not applicable.

### **State Rule Applicability – Individual Facilities**

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

The boilers at this source were constructed and in operation prior to September 21, 1983. Therefore, they are subject to the requirements of 326 IAC 6-2-3. The two (2) boilers were both constructed in 1976. The particulate emission limitations of 326 IAC 6-2-3 are based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the

maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate.

$$Pt = 50 \times 0.67 \times 45.0 / 76.5 \times (17.85)^{0.75} \times 2^{0.25} = 1.91 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), "Particulate emissions from any facility used for indirect heating purposes which has 250 mmBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/mmBtu heat input." Therefore, the limitation for each of the two (2) boilers is 0.6 lb/MMBtu.

Based on Appendix A and AP-42, the potential to emit PM from the natural gas-fired boiler is:

$$1.90 \text{ lb/MMcf} \times 1 \text{ MMcf}/1,000 \text{ MMBtu} = 0.0019 \text{ lb/MMBtu}$$

Based on Appendix A and AP-42, the potential to emit PM from the wood waste-fired boiler is 0.56 lb/MMBtu.

Therefore, the two (2) boilers will comply with this rule.

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

- (a) The debarking and end cutting, chipper hog, and veneering have potential particulate emissions less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) those processes are exempt from the requirements of 326 IAC 6-3-2.
- (b) The natural gas-fired boiler and the wood waste-fired boiler are combustion units for indirect heating. Therefore, pursuant to 326 IAC 6-3-1(b)(1), the boilers are exempt from the requirements of 326 IAC 6-3-2.
- (c) Pursuant to 326 IAC 6-3-2, the particulate from the sawmill, identified as EU-Salem Saw Mill, shall not exceed 10.8 pounds per hour when operating at a process weight rate of 4.25 tons per hour. The process weight rate is based on the maximum capacity per day (85 logs/day x 800 lbs/log = 34 tons/day, 34 tons/day / 8 hrs/day = 4.25 tons/hr). The unrestricted potential emissions from the saw mill are 1.49 pounds per hour. Therefore, the saw mill will comply with this rule.
- (d) Pursuant to 326 IAC 6-3-2, the particulate from the trimming operation shall not exceed 10.8 pounds per hour when operating at a process weight rate of 4.25 tons per hour. The

process weight rate is based on the maximum capacity per day (85 logs/day x 800 lbs/log = 34 tons/day, 34 tons/day / 8 hrs/day = 4.25 tons/hr). The unrestricted potential emissions from the trimming operation are 1.49 pounds per hour. Therefore, the trimming operation will comply with this rule.

- (e) Pursuant to 326 IAC 6-3-2, the particulate from the veneer clipping shall not exceed 10.8 pounds per hour when operating at a process weight rate of 4.25 tons per hour. The process weight rate is based on the maximum capacity per day (85 logs/day x 800 lbs/log = 34 tons/day, 34 tons/day / 8 hrs/day = 4.25 tons/hr). The unrestricted potential emissions from the veneer clipping are 1.49 pounds per hour. Therefore, the veneer clipping will comply with this rule.

The limitations in (c) through (e) are based upon the following:

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

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

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

The potential SO<sub>2</sub> emissions from this source are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 7-1.1.

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

This source does not consist of petroleum refining operations, ferrous metal smelting or a refuse incinerator. Therefore, the source is not subject to the requirements of 326 IAC 9-1.

#### 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

The unrestricted potential NO<sub>x</sub> emissions from this source, which is located in Floyd County, are less than forty (40) tons per year. Therefore, the requirements of 326 IAC 10-1 are not applicable.

### **Compliance Requirements**

Compliance monitoring is required for the wood waste-fired boiler in order to ensure that the boiler and the associated feed systems are operating properly at all times. The boiler and the feed systems must operate properly in order for the boiler to comply with 326 IAC 6-2-3, and 326 IAC 5-1. The following compliance monitoring conditions are applicable:

Daily visible emission notations of the boiler stack (Wood Boiler Stack) exhaust 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 and Implementation shall be considered a deviation from this permit.

### **Conclusion**

The operation of this wood veneer manufacturing source shall be subject to the conditions of the **Minor Source Operating Permit 043-19407-00006**.

**Appendix A: Emission Calculations  
Woodworking**

Company Name: B.L. Curry & Sons, Inc.  
 Address City IN Zip: 1014 East 6th Street, New Albany, IN 47150  
 MSOP No.: 043-19407  
 Plt ID: 043-00006  
 Reviewer: CarrieAnn Paukowits  
 Application Date: July 26, 2004

**Woodworking Capacity Calculation**

Number of Logs per Day	Operating Schedule (hrs/day)	Capacity (logs/hr)	Weight of Logs (lbs/log)	Capacity (lbs/hr)	Safety Factor	Maximum Capacity (lbs/hr)
85	16	5.31	800	4250	2	8500

**Emissions Calculations**

Process	Maximum Throughput (lbs/hr)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM Emissions (lbs/hr)	PM10 Emissions (lbs/hr)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)
	lbs/hr						
Debarking and End Cutting	8500	0.02	0.011	0.085	0.047	0.372	0.205
Saw mill	8500	0.35	0.200	1.49	0.850	6.52	3.72
Trimming	8500	0.35	0.200	1.49	0.850	6.52	3.72
Veneer Clipping	8500	0.35	0.200	1.49	0.850	6.52	3.72
				<b>19.9</b>			<b>11.4</b>

**Methodology**

Maximum Capacity (lbs/hr) = (Number of logs/day / Operating schedule (hrs/day)) x Weight of Logs (lbs/log) x Safety Factor

Emission factors from FIRES 6.23, SCC 3-07-008-01, 3-07-008-02 and 3-07-008-03

PM/PM10 Emissions (lbs/hr) = Maximum Throughput (lbs/hr) x 1 ton/2,000 lbs x Emission Factor (lbs/ton)

PM/PM10 Emissions (tons/yr) = Emissions (lbs/hr) x 8,760 hrs/yr x 1 lb/2,000 tons

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

**Company Name: B.L. Curry & Sons, Inc.  
 Address City IN Zip: 1014 East 6th Street, New Albany, IN 47150  
 MSOP No.: 043-19407  
 Plt ID: 043-00006  
 Reviewer: CarrieAnn Paukowits  
 Application Date: July 26, 2004**

Capacity (MMBtu/hr) 11.7

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.56	0.517	0.447	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	28.7	26.5	22.9	1.28	11.3	0.666	30.7

\*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 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**

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 bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

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

**Company Name: B.L. Curry & Sons, Inc.  
 Address City IN Zip: 1014 East 6th Street, New Albany, IN 47150  
 MSOP No.: 043-19407  
 Plt ID: 043-00006  
 Reviewer: CarrieAnn Paukowits  
 Application Date: July 26, 2004**

Capacity (MMBtu/hr) 11.7

	Selected Hazardous Air Pollutants					Total
	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	0.205	0.215	0.225	0.974	0.097	<b>1.72</b>

**Methodology**

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

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

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

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

**Company Name: B.L. Curry & Sons, Inc.  
Address City IN Zip: 1014 East 6th Street, New Albany, IN 47150  
MSOP No.: 043-19407  
Pit ID: 043-00006  
Reviewer: CarrieAnn Paukowits  
Application Date: July 26, 2004**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

6.15

53.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.051	0.205	0.016	2.69	0.148	2.26

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 5 for HAPs emissions calculations.

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

**Company Name:** B.L. Curry & Sons, Inc.  
**Address City IN Zip:** 1014 East 6th Street, New Albany, IN 47150  
**MSOP No.:** 043-19407  
**Pit ID:** 043-00006  
**Reviewer:** CarrieAnn Paukowits  
**Application Date:** July 26, 2004

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.00006	0.00003	0.002	0.0485	0.00009

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	<b>Total</b>
Potential Emission in tons/yr	0.00001	0.00003	0.00004	0.00001	0.00006	<b>0.051</b>

Methodology is the same as page 4.

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

**Appendix A: Emission Calculations  
Sand Processing**

**Company Name: B.L. Curry & Sons, Inc.  
Address City IN Zip: 1014 East 6th Street, New Albany, IN 47150  
MSOP No.: 043-19407  
Pit ID: 043-00006  
Reviewer: CarrieAnn Paukowits  
Application Date: July 26, 2004**

\* \* unpaved roads \* \*

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

$$\begin{aligned}
 & 20 \text{ trip/hr} \times \\
 & 0.077 \text{ mile/trip} \times \\
 & 2 \text{ (round trip) } \times \\
 & 8760 \text{ hr/yr} = \qquad \qquad \qquad 26954 \text{ miles per year}
 \end{aligned}$$

**PM**

$$\begin{aligned}
 E_f &= k \cdot [(s/12)^{0.9}] \cdot [(W/3)^b] \\
 &= 6.05 \text{ lb/mile} \\
 \text{where } k &= 4.9 \text{ (particle size multiplier for PM)} \\
 s &= 4.8 \text{ mean \% silt content of unpaved roads} \\
 b &= 0.45 \text{ Constant for PM-10 and PM-30 or TSP} \\
 W &= 30 \text{ tons average vehicle weight} \\
 M &= 0.2 \text{ surface material moisture content, \% (default is 0.2 for dry conditions)}
 \end{aligned}$$

$$E = \frac{6.05 \text{ lb/mi} \times 26953.8 \text{ mi/yr}}{2000 \text{ lb/ton}} = 81.59 \text{ tons/yr}$$

Taking natural mitigation due to precipitation into consideration:

$$E_{ext} = E \cdot [(365-p)/365] = 53.6 \text{ tons/yr}$$

where p = 125 days of rain greater than or equal to 0.01 inches(see Fig. 13.2.2-1)

**PM10**

$$\begin{aligned}
 E_f &= k \cdot [(s/12)^{0.9}] \cdot [(W/3)^b] \\
 &= 1.85 \text{ lb/mile} \\
 \text{where } k &= 1.5 \text{ (particle size multiplier for PM-10)} \\
 s &= 4.8 \text{ mean \% silt content of unpaved roads} \\
 b &= 0.45 \text{ Constant for PM-10 and PM-30 or TSP} \\
 W &= 30 \text{ tons average vehicle weight} \\
 M &= 0.2 \text{ surface material moisture content, \% (default is 0.2 for dry conditions)}
 \end{aligned}$$

$$E = \frac{1.85 \text{ lb/mi} \times 26954 \text{ mi/yr}}{2000 \text{ lb/ton}} = 24.98 \text{ tons/yr}$$

Taking natural mitigation due to precipitation into consideration:

$$E_{ext} = E \cdot [(365-p)/365] = 16.4 \text{ tons/yr}$$

where p = 125 days of rain greater than or equal to 0.01 inches(see Fig. 13.2.2-1)