



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 27, 2004

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

TO: Interested Parties / Applicant  
RE: Arch Wood Products / 127-19539-00066  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Ms. Cynthia Storelli  
Arch Wood Protection, Inc.  
1579 Koppers Road  
Conley, Georgia 30288

October 27, 2004

Re: 127-19539-00066  
Revised Registration No. 127-18313-00066

Dear Ms. Storelli:

The application from Arch Wood Protection, Inc. received on August 30, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5-6(d), it has been determined that the registration for the plant that produces wood preservatives at a maximum potential rate of 275,730,000 pounds per year, which involves mixing and compounding of chemicals located at 2852 Raystone Drive, Valparaiso, Indiana, 46383, is hereby revised as follows:

- (a) Four (4) Pack A Storage Tanks, identified as Tank 201, Tank 202, Tank 203 and Tank 204. Tank 201 has a capacity of 8,565 gallons; Tank 202 has a capacity of 11,749 gallons; Tank 203 has a capacity of 13,535 gallons and Tank 204 has a capacity of 15,227 gallons.
- (b) One (1) Pack B Storage Tank, identified as Tank 401 with a capacity of 10,152 gallons.
- (c) Two (2) MEA Storage Tanks, identified as Tanks 101 and Tank 102 each with a capacity of 15,227 gallons.
- (d) Two (2) Pack A Reactors, identified as RA1 and RA2 with a capacity of 5,000 gallons each.
- (e) One (1) Reactor, identified as RA3, with a capacity of 6,500 gallons. The acid mist emission from the reactors is voluntarily controlled by venturi scrubber.
- (f) One (1) natural gas fired boiler with a heat input capacity of 10MMBTU/hr.
- (g) One (1) 60% chromated copper arsenate (CCA) Storage Tank, identified as Tank 501 with a capacity of 15,585 gallons. The tank consists of an east storage compartment, identified as 501E, with a capacity of 7,462 gallons and a west storage compartment, identified as 501W, with a capacity of 8,123 gallons.
- (h) One (1) repackaging operation in the manufacturing facility repackaging a maximum of 200,000 pounds of AntiBlu XP, 12,000 pounds of AntiBlu brightener, and 1600 pounds of defoamer using a small transfer pump or drum pump.

The following conditions shall be applicable:

- (1) Opacity Limitations [326 IAC 5-1-2

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (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.

(2) Particulate Emissions from Process Operations [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the PM (acid mist overspray) emissions from the two (2) Reactors, RA1, and RA2 shall each be limited to 16.3 pounds per hour at 15,738 pounds per hour process weight. The PM limit shall be determined using the following equation:

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

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

The venturi scrubber shall be operated according to the manufacturer's specifications at all times that the reactors RA-1 or RA-2 are in operation.

(3) New Source Performance Standards (NSPS) [326 IAC 12 and 40 CFR § 60, Subpart Kb] and [326 IAC 8-9]

- (a) Pursuant to 326 IAC 12 and Part 60.116, section (b) of this NSPS, the owner or operator of the two (2) MEA storage Tanks #1 and #2 with a capacity of 15,227 gallons each; three (3) Pack A Storage Tanks with capacities of 13,535 gallons, 11,749 gallons, and 15,227 gallons; and the one (1) 60% CCA Storage Tank (Tank 501) with a capacity of 15,585 gallons shall keep readily accessible records showing the dimension of these storage tanks and an analysis showing the capacity of each storage tank.
- (b) Pursuant to 326 IAC 12 and Part 60.116b section (a) of this NSPS, the owner or operator of the two (2) MEA storage Tanks #1 and #2 with a capacity of 15,227 gallons each; three (3) Pack A Storage Tanks with capacities of 13,535 gallons, 11,749 gallons and 15,227 gallons; and the one (1) 60% CCA Storage Tank (Tank 501) with a capacity of 15,585 gallons shall keep copies of the records required in section (a) of this condition for the life of the tanks.

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

Pursuant to 326 IAC 8-9, the owner or operator of one (1) Pack A Storage Tank identified as Tank 201, with a capacity of 8,565 gallons, and the one (1) Pack B Storage Tank identified as Tank 401, with a capacity of 10,152 gallons shall maintain a record and submit to the department a report containing the following information of the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

(5) New Source Performance Standards (NSPS)[326 IAC 12 and 40 CFR 60, Subpart Dc]

- (a) Pursuant to Part 60.48c(g), the owner or operator of the boiler shall record and maintain records of the amount of each fuel combusted during each day.
- (b) Pursuant to Part 60.48c(i), all records shall be maintained by the owner or operator for a period of two years following the date of such record.

(6) Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the boiler shall be limited to 0.6 pounds per million BTU heat input.

This registration supersedes any previous air approvals 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**

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) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

TE/EVP

cc: File – Porter County  
Porter County Health Department  
Northwest Regional Office  
Air Compliance – Michael Hall  
Permit Tracking  
Compliance Data Section  
Technical Support and Modeling

<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

<b>Company Name:</b>	<b>Arch Wood Protection, Inc.</b>
<b>Address:</b>	<b>2852 Raystone Drive</b>
<b>City:</b>	<b>Valparaiso, Indiana 46383</b>
<b>Authorized individual:</b>	<b>Ken Cogan</b>
<b>Phone #:</b>	<b>(404) 363-6300 extension 6003</b>
<b>Registration #:</b>	<b>127-18313-00066</b>

I hereby certify that Arch Wood Protection, Inc. is still in operation and is in compliance with the requirements of Registration **127-18313-00066**.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>



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Ms. Cynthia Storelli  
Arch Wood Protection, Inc.  
1579 Koppers Road  
Conley, Georgia 30288

October 27, 2004

Re: 127-19539-00066  
Notice-only change to  
Registration No. 127-18313-00066

Dear Ms. Storelli:

Arch Wood Protection, Inc. was issued a registration on February 11, 2004 for a plant that produces wood preservatives. A letter notifying the Office of Air Quality of the changes listed below was received on August 30, 2004. Pursuant to the provisions of 326 IAC 2-5.5-6(d) the registration is hereby revised as follows:

A new 10,152 gallon tank is being added to the source (Tank 401) for the storage of Pack B. The existing tank 201 which was authorized for storage of either Pack A or Pack B will now only be used to store Pack A. Also, a retired storage vessel will be put back in service for the storage of 60% chromated copper arsenate. This storage vessel (Tank 501) consists of an east storage compartment (501E) with a storage capacity of 7,462 gallons and a west storage compartment (501W) with a storage capacity of 8,123 gallons. The two compartments are attached giving a total storage vessel capacity of 15,585 gallons. The emissions from the addition of these storage tanks are below the levels specified in 326 IAC 2-1.1-3(e)(1) (Exemptions).

The source is also proposing to repackage its product referred to as AntiBlu XP and accompanying product brightener and defoamer. Currently, the AntiBlu XP is packaged in intermediate bulk containers (totes) at the manufacturing facility. It is proposed that the totes of AntiBlu XP be shipped to the Valparaiso, IN plant for repackaging into smaller quantity drums and pails. Additionally, the accompanying product brightener and defoamer are packaged in totes and drums, respectively. It is proposed that the Valparaiso, IN plant receive totes of the brightener to repackage into drums and pails, and drums of the defoamer to repackage into pails.

This source will repackage a maximum of 200,000 pounds of AntiBlu XP, 12,000 pounds of brightener, and 1600 pounds of defoamer per year. These materials will be transferred from the larger packaging to the smaller packaging through the use of a small transfer pump or drum pump. The repackaging activity will take place in the manufacturing facility of the Valparaiso, IN plant. This activity will not generate any additional emissions.

Since the addition of the new tanks and the repackaging operation result in an emission increase that is less than the levels specified in 326 IAC 2-1.1-3(e)(1) (Exemptions), the registration is hereby revised as follows, pursuant to the provisions of 326 IAC 2-5.5-6(d)(12) (with new language bolded and old language stricken):

The following descriptive information has been revised:

- (a) ~~Three (3)~~ **Four (4)** Pack A Storage Tanks, identified as **Tank 201**, Tank 202, Tank 203 and Tank 204. **Tank 201 has a capacity of 8,565 gallons**; Tank 202 has a capacity of 11,749 gallons; Tank 203 has a capacity of 13,535 gallons and Tank 204 has a capacity of 15,227 gallons.
- (b) One (1) ~~Pack A or~~ Pack B Storage Tank, identified as Tank ~~204~~ **401** with a capacity of ~~8,565~~ **10,152** gallons.
- (c) Two (2) MEA Storage Tanks, identified as Tanks 101 and Tank 102 each with a capacity of 15,227 gallons.
- (d) Two (2) Pack A Reactors, identified as RA1 and RA2 with a capacity of 5,000 gallons each.
- (e) One (1) Reactor, identified as RA3, with a capacity of 6,500 gallons. The acid mist emission from the reactors is voluntarily controlled by venturi scrubber.
- (f) One (1) natural gas fired boiler with a heat input capacity of 10MMBTU/hr.
- (g) **One (1) 60% chromated copper arsenate (CCA) Storage Tank, identified as Tank 501 with a capacity of 15,585 gallons. The tank consists of an east storage compartment, identified as 501E, with a capacity of 7,462 gallons and a west storage compartment, identified as 501W, with a capacity of 8,123 gallons.**
- (h) **One (1) repackaging operation in the manufacturing facility repackaging a maximum of 200,000 pounds of AntiBlu XP, 12,000 pounds of AntiBlu brightener, and 1600 pounds of defoamer using a small transfer pump or drum pump.**

The requirements of 326 IAC 12 and 40 CFR 60, Subpart Kb are applicable to the storage tank, identified as 501 because it has a storage capacity of greater than 40 cubic meters. Pursuant to 40 CFR 60.116(a) and (b), the Permittee is required to keep readily accessible records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank. Therefore, condition 3 of the registration has been revised to include Tank 501. Note that although the applicability of 40 CFR 60, Subpart Kb has been changed to apply to storage tanks with a storage capacity of greater than 75 cubic meters, the October 15, 2003 changes made to this NSPS have not yet been incorporated into the Indiana state rules. Therefore, the tank is subject to the requirements of 40 CFR 60, Subpart Kb under 326 IAC 12.

- (3) New Source Performance Standards (NSPS) [326 IAC 12 and 40 CFR § 60, Subpart Kb] and [326 IAC 8-9]

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- (a) Pursuant to **326 IAC 12 and** Part 60.116, section (b) of this NSPS, the owner or operator of the two (2) MEA storage Tanks #1 and #2 with a capacity of 15,227 gallons each; ~~and~~ three (3) Pack A Storage Tanks with capacities of 13,535 gallons, 11,749 gallons, and 15,227 gallons; **and the one (1) 60% CCA Storage Tank (Tank 501) with a capacity of 15,585 gallons** shall keep readily accessible records showing the dimension of these storage tanks and an analysis showing the capacity of each storage tank.
  - (b) Pursuant to **326 IAC 12 and** Part 60.116b section (a) of this NSPS, the owner or operator of the two (2) MEA storage Tanks #1 and #2 with a capacity of 15,227 gallons each; ~~and~~ three (3) Pack A Storage Tanks with capacities of 13,535 gallons, 11,749 gallons and 15,227 gallons; **and the one (1) 60% CCA Storage Tank (Tank 501) with a capacity of 15,585 gallons** shall keep copies of the records required in section (a) of this condition for the life of the tanks.

The requirements of 326 IAC 12 and 40 CFR 60, Subpart Kb were not included in the registration for the new tank 401 because the storage capacity of the tank is less than 40 cubic meters (10,554 gallons). However, since the tank is a volatile organic liquid (VOL) storage tank located in Porter County and has a storage capacity less than 39,000 gallons, pursuant to 326 IAC 8-9-1, it is subject to the record keeping and reporting requirements of 326 IAC 8-9-6 (a) and (b) and is exempt from all other requirements of the rule. Condition 4 of the registration has been revised to include Tank 401.

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

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Pursuant to 326 IAC 8-9, the owner or operator of one (1) Pack A ~~or Pack B~~ Storage Tank identified as Tank 201, with a capacity of 8,565 gallons, **and the one (1) Pack B Storage Tank identified as Tank 401, with a capacity of 10,152 gallons** shall maintain a record and submit to the department a report containing the following information of the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Trish Earls, at (973) 575-2555, ext. 3219 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
TE/EVP

cc: File – Porter County  
Porter County Health Department  
Northwest Regional Office  
Air Compliance – Michael Hall  
Permit Tracking  
Compliance Data Section  
Technical Support and Modeling