



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 22, 2005
RE: Railworks Wood Products / 125-20663-00034
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

**Railworks Wood Products, Inc.
3818 South County Road 50 East
Winslow, Indiana 47598**

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 125-20663-00034

Issued by:
Original Signed By:
Paul Dubenetzky, Assistant Commissioner
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)]

The Permittee owns and operates two (2) natural gas-fired boilers and two (2) diesel-fired generators at a stationary biomedical material manufacturing operation.

Authorized Individual:	Operations Manager
Source Address:	3818 South County Road 50 East, Winslow, Indiana 47598
Mailing Address:	3818 South County Road 50 East, Winslow, Indiana 47598
General Source Phone:	(812) 789-5331
SIC Code:	2491
County Location:	Pike (Patoka Township)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) wood-fired boiler, installed in 1983, with a maximum output rating of 200 horsepower per hour.
- (b) Four (4) fixed roof tanks, identified as Tank 1 and Tank 2, constructed in 1996, Tank 3 and Tank 4, constructed in 2005, with a maximum capacity of 29,610 gallons of creosote, each, and a maximum annual throughput of 150,000 of creosote, each.
- (c) Two (2) pressure vessels, identified as Cyl-1 and Cyl-3, constructed in 1980, with a maximum capacity of 1,000 gallons of creosote per day, each, and one charge per day, each.
- (d) One (1) Diesel Fuel Storage Tank, installed in 1983, with a maximum capacity of 2,000 gallons.
- (e) One (1) woodworking operation consisting of two (2) trim/rough cut saws, installed in 1983, with a combined maximum capacity of 6,480 ties per day, control by a cyclone, and exhausting to atmosphere.
- (f) One (1) storage silo, identified as Wood Chip Silo, constructed in 1983, with a maximum storage capacity of 42,000 pounds of wood chips.
- (g) One (1) wood chip conveyor system, installed in 1983, with a maximum capacity of 42,000 pounds of wood chips per day.

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]

This permit to construct 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

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]

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction 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.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 or 326 IAC 2-3 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (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, IN 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.9 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 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.10 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.11 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]

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.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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.13 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (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.14 Credible Evidence [326 IAC 1-1-6]

For the purposes 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 has 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 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 construct and 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 good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

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]

- (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 (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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]

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]

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]

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. If a Permittee is required to have an Operation,

Maintenance and Monitoring (OMM) under 40 CFR 60, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

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

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) 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

- (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]

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]

- (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 2-6.1-2] [IC 13-14-1-13]

- (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 quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports does 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 purposes of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (a) One (1) wood-fired boiler, installed in 1983, with a maximum output rating of 200 horsepower 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 [326 IAC 2-6.1]

D.1.1 PM Emissions [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-4(a) (PM Emissions for Sources of Indirect Heating), PM emissions from the wood-fired boiler shall not exceed 0.6 lbs/MMBtu.

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

D.1.2 Visible Emissions Notations

- (a) Daily visible emission notations of the wood-fired 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, Implementation, Records, and Reports, 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.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of daily visible emission notations of the wood fired boiler stack exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (b) Four (4) fixed roof tanks, identified as Tank 1 and Tank 2, constructed in 1996, Tank 3 and Tank 4, constructed in 2005, with a maximum capacity of 29,610 gallons of creosote, each, and a maximum annual throughput of 150,000 of creosote, each.
- (c) Two (2) pressure vessels, identified as Cyl-1 and Cyl-3, constructed in 1980, with a maximum capacity of 1,000 gallons of creosote per day, each, and one charge per day, each.
- (d) One (1) Diesel Fuel Storage Tank, installed in 1983, with a maximum capacity of 2,000 gallons.

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

Emission Limitations and Standards [326 IAC 2-6.1]

- D.2.1 Standards of Performance for Volatile Liquid Storage Vessels [326 IAC 12] [Subpart Kb, 40 CFR 60.116b(b)]

Pursuant to 40 CFR 60.116b(b), the owner or operator shall keep readily accessible records showing the dimensions of Tank 1, Tank 2, Tank 3, and Tank 4, and an analysis showing the capacity of the storage vessels.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)] [326 IAC 2-12] [Subpart Kb, 40 CFR 60.116b(a)]

- D.2.2 Record Keeping Requirements

-
- (a) Records to show compliance with Condition D.2.1 shall be kept for the life of the source.
 - (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (e) One (1) woodworking operation consisting of two (2) trim/rough cut saws, installed in 1983, with a combined maximum capacity of 6,480 ties per day, control by a cyclone, and exhausting to atmosphere.
- (f) One (1) storage silo, identified as Wood Chip Silo, constructed in 1983, with a maximum storage capacity of 42,000 pounds of wood chips.
- (g) One (1) wood chip conveyor system, installed in 1983, with a maximum capacity of 42,000 pounds of wood chips per day.

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

Emission Limitations and Standards [326 IAC 2-6.1]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate emissions from woodworking operation and wood conveyor system shall not exceed the pound per hour emission rate established as E in the following formulas:

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

and

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

The emissions rate E has been established for the units as follows:

Units	Process Weight Rate per unit (tons/hour)	PM Emission Limit per unit (lbs/hr)
Wood chip conveyor	0.88	3.76
Woodworking operation	97.2	50.99

D.3.2 Particulate Control

The cyclone for particulate control shall be in operation and control emissions from the woodworking operation at all times that the trim/rough cut saws are in operation.

D.3.3 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 woodworking operation and the cyclone.

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

D.3.4 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone 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, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.5 Cyclone Inspections

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

D.3.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, 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.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the cyclone stack exhaust.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5 and the dates the vents are redirected.
- (c) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**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).

Company Name:	Railworks Wood Products, Inc.
Address:	3818 South County Road 50 East
City:	Winslow, Indiana 47598
Phone #:	(812) 789-5331
MSOP #:	125-20663-00034

I hereby certify that Railworks Wood Products, Inc. is still in operation.
 no longer in operation.

I hereby certify that Railworks Wood Products, Inc. is in compliance with the requirements of MSOP 125-20663-00034
 not in compliance with the requirements of MSOP 125-20663-00034

Authorized Individual (typed):
Title:
Signature:
Date:

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.

Noncompliance:

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:

Mail to: Permit Administration & Development Section
Office Of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Railworks Wood Products, Inc.
3818 South County Road 50 East
Winslow, Indiana 47598

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that (? Company Name), (complete source location), Indiana, (zip code), completed construction of the (? operation/facility) on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on (? date) and as permitted pursuant to **Minor Source Operating Permit No. MSOP 125-20663-00034, Plant ID No. 125-00034** issued on _____.
5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____.

My Commission expires:

Signature

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Railworks Wood Products, Inc.
Source Location:	3818 South County Road 50 East, Winslow, IN 47598
County:	Pike
SIC Code:	2491
Operation Permit No.:	125-20663-00034
Permit Reviewer:	Jenny Acker

The Office of Air Quality (OAQ) has reviewed an application from Railworks Wood Products, Inc. relating to the operation of creosote wood preserving operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) wood-fired boiler, installed in 1983, with a maximum rating of 200 horsepower per hour.

Unpermitted Emission Units and Pollution Control Equipment

- (b) Two (2) fixed roof tanks, identified as Tank 3 and Tank 4, constructed in 2005, with a maximum capacity of 29,610 gallons of creosote, each, and a maximum annual throughput of 150,000 of creosote, each.
- (c) Two (2) fixed roof tanks, identified as Tank 1 and Tank 2, constructed in 1996, with a maximum capacity of 29,610 gallons of creosote, each, and a maximum annual throughput of 150,000 of creosote, each.
- (d) One (1) Diesel Fuel Storage Tank, installed in 1983, with a maximum capacity of 2,000 gallons.

The source also consists of the following emission units included in the SSOA application, received by IDEM, OAQ, on December 26, 1996.

- (e) One (1) woodworking operation consisting of two (2) trim/rough cut saws, installed in 1983, with a combined maximum capacity of 6,480 ties per day, control by a cyclone, and exhausting to atmosphere.
- (f) One (1) storage silo, identified as Wood Chip Silo, constructed in 1983, with a maximum storage capacity of 42,000 pounds of wood chips.

- (g) Two (2) pressure vessels, identified as Cyl-1 and Cyl-3, constructed in 1980, with a maximum capacity of 1,000 gallons of creosote per day, each, and one charge per day, each.
- (h) One (1) wood chip conveyor system, installed in 1983, with a maximum capacity of 42,000 pounds of wood chips per day.
- (i) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

Existing Approvals

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

- (a) S125-7929-00034 issued on January 28, 1998

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Cyclone	Woodworking Operations	30	3.0	5600	Ambient
Boiler	Wood-fired Boiler	26	2.0	Varies	Varies

Recommendation

The staff recommends to the Commissioner that the construction and 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.

A complete application for the purposes of this review was received on February 2, 2005.

Emission Calculations

See Appendix A, pages 1-7, of this document for detailed emission calculations.

Potential to Emit 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.

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

Pollutant	Potential to Emit (tons/yr)
PM	42.89
PM-10	42.21
SO ₂	0.73
VOC	14.80
CO	17.58
NO _x	14.36
HAP (total)	1.20

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀, SO₂, VOC, CO, and NO_x is less than 100 tons per year and the potential to emit of PM/PM₁₀ is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) 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 Pike County (Patoka Township)

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

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x are considered when evaluating the rule applicability relating to ozone. Pike County has been

designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Pike County (Patoka Township) has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (c) Pike County has been classified as attainment or unclassifiable in Indiana for SO₂, NO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	30.38
PM-10	29.70
SO ₂	0.73
VOC	14.80
CO	17.58
NO _x	14.36
Combination HAPs	1.20

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

Federal Rule Applicability

NSPS

- (a) Pursuant to 40 CFR 60.110b(c), except as specified in paragraphs (a) and (b) of 40 CFR 60.116b, vessels with a capacity greater than or equal to 75 m³ and less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from the General Provisions (part 60, Subpart A) and from the provisions of this subpart (40 CFR 60, Subpart Kb (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After July 23, 1984)). The true vapor pressure of creosote is approximately 6 kPa. Therefore, the following requirements shall apply to tanks T1 through T4:

- (1) The source shall keep readily accessible records showing the dimensions of the storage vessels and an analysis showing the capacity of each storage vessel.
 - (2) The records shall be kept for the life of the source.
- (b) The two (2) pressure vessels, identified as Cyl-1 and Cyl-3 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984)) due to a capacity less than 40,000 gallons.
 - (c) The Diesel Storage Tank is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110a, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984)) due to a capacity less than 40,000 gallons.
 - (d) The wood-fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)) due to a size less than 10 MMbtu/hr.

NESHAPS

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

State Rule Applicability – Entire Source

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

The emissions associated with this source are less than PSD major source levels. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-3 (Emission Offsets)

The emissions associated with this source are less than the Emission Offset major source levels. Therefore, 326 IAC 2-3 does 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 this permit:

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability – Boiler

326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating for Specified Facilities)

Pursuant to 326 IAC 6-2-3(a) particulate matter emission from the wood-fired boiler shall be limited to 2.74lbs/MMBtu by the following equation:

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

Where:

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft) (26)

However, pursuant to 326 IAC 6-2-3(e) for facilities began operation after June 8, 1972, where Q is less than 250 million Btu/hr, Pt shall not exceed 0.6 lb per MMBtu heat input.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential to emit of Sulfur Dioxide of the wood-fired boiler is less than 25 tpy. Therefore pursuant to 326 IAC 7-1.1-1, 326 IAC 7-1.1-2 Sulfur Dioxide Emissions Limitations is not applicable.

State Rule Applicability – Tanks T1 through T4

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

The potential to emit of VOC is less than twenty-five tons per year. Therefore, 326 IAC 8-1-6 is not applicable.

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

The source is not located in Clark, Floyd, Lake or Porter County. Therefore, 326 IAC 8-9 does not apply.

State Rule Applicability – Retort Vessels, Cyl-1 and Cyl-3

326 IAC 8-1-6 (New facilities; general reduction requirements)

The potential to emit of VOC is less than twenty-five tons per year. Therefore, BACT (Best Available Control Technology) 326 IAC 8-1-6 is not applicable.

State Rule Applicability – Diesel Storage Tank

326 IAC 8-4-3 (Petroleum liquid storage facilities)

The capacity of the diesel storage tank is less than 39,000 gallons. Therefore, 326 IAC 8-4-3 is not applicable.

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

Pursuant to 326 IAC 8-4-6(a)(8), "Gasoline dispensing facilities" means any facility where gasoline is into motor vehicle fuel tanks or portable containers from a storage tanks with a capacity of 575 gallons or more. Diesel fuel is not considered to be motor vehicle fuel. Therefore, 326 IAC 8-4-6 is not applicable.

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

The source is not located in Clark, Floyd, Lake or Porter County. Therefore, 326 IAC 8-9 does not apply.

State Rule Applicability – Woodworking Operations

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

The particulate emissions from woodworking operations and wood conveyor system shall not exceed the pound per hour emission rate established as E in the following formulas:

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

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

and $P = \text{process weight rate in tons per hour}$

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$

$P = \text{process weight rate in tons per hour}$

The emissions rate E has been established for the units as follows:

Units	Process Weight Rate per unit (tons/hour)	PM Emission Limit per unit (lbs/hr)
Wood chip conveyor	0.88	3.76
Trim/rough cut saws	97.2	50.99

Compliance Requirements

Permits issued under 326 IAC 2-6.1-1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

- (a) The wood-fired boiler has applicable compliance monitoring conditions as specified below:

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

- (b) The woodworking operations has applicable compliance monitoring conditions as specified below:

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

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

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

Conclusion

The operation of this creosote wood preserving plant shall be subject to the conditions of the Minor Source Operating Permit 125-20663-00034.

**Appendix A: Emissions Calculations
Summary**

Company Name: Railworks Wood Products
Address City IN Zip: 3818 South County Road 50 East, Winslow, Indiana 47598
Permit No. 125-20663
Pit ID: 125-00034
Reviewer: Jenny Acker
Date: January 18, 2005

Facility	Uncontrolled PTE (tpy)					
	Pollutant					
	PM	PM10	NOx	SO2	CO	VOC
Board Cutting	14.72	14.72	--	--	--	--
¹⁾ Wood Chip Storage and Conveyance	16.45	16.45	--	--	--	--
Boiler	11.72	11.05	14.36	0.73	17.58	0.38
Retort	--	--	--	--	--	14.41
Diesel Fuel Tank	--	--	--	--	--	neg.
Roads	5.53	5.53	--	--	--	--
Total	42.89	42.21	14.36	0.73	17.58	14.80

Facility	Controlled PTE (tpy)					
	Pollutant					
	PM	PM10	NOx	SO2	CO	VOC
Board Cutting	2.21	2.21	--	--	--	--
¹⁾ Wood Chip Storage and Conveyance	16.45	16.45	--	--	--	--
Boiler	11.72	11.05	14.36	0.73	17.58	0.38
Retort	--	--	--	--	--	14.41
Diesel Fuel Tank	--	--	--	--	--	neg.
Roads	2.77	2.77	--	--	--	--
Total	30.38	29.70	14.36	0.73	17.58	14.80

¹⁾ The source purchases briquette style wood chip from off-site, stores the wood chips in a silo which gravity feeds to a conveyor. There are no emission factors for this this type of process and PM/PM10 emissions will be negligible. Therefore, the potential to emit PM/PM10 is based on 326 IAC 6-3-2 limitations

Hazardous Air Pollutant	PTE				
	CAS Number	Tanks 1-4 (lbs/yr)	Retort (lbs/yr)	Boiler (tpy)	Total (tpy)
Acrolein	107-02-8	0.10			0.00
Benzene	71-43-2	5.23		0.12	0.13
o-Cresol	95-48-7	1.31			6.54E-04
m-Cresol	108-39-4	2.35			1.18E-03
p-Cresol	106-44-5	2.62			1.31E-03
Dibenzofuran	132-64-9	5.23	1.74E+02		0.09
Ethylbenzene	100-41-4	2.62			1.31E-03
Formaldehyde	50-00-0			0.13	0.13
Hydrogen Chloride	7647-01-0			0.56	0.56
Naphthalene	91-20-3	36.61	3.93E+02		0.21
Phenol	108-95-2	5.23			2.62E-03
Styrene	100-42-5	5.23		0.06	0.06
Toluene	108-88-3	10.46			0.01
Xylene	1330-20-7	20.92			0.01

Total of all HAPs (tpy) 1.20

**Appendix A: Emission Calculations
PM / PM10 Emissions Calculations
Wood Chip Silo**

Company Name: Railworks Wood Products
Address City IN Zip: 3818 South County Road 50 East, Winslow, Indiana 47598
Permit No. 125-20663
Plt ID: 125-00034
Reviewer: Jenny Acker
Date: January 18, 2005

Control Device	Inlet Flow (acfm)	Inlet Grain Loading (grains/acfm)	Control Efficiency %	Controlled PTE PM (lbs/hr)	Controlled PTE PM (tpy)	PTE PM (lbs/hr)	PTE PM (tpy)
Cyclone	5600	0.07	85.00%	0.50	2.21	3.36	14.72

Control Device	Inlet Flow (acfm)	Inlet Grain Loading (grains/acfm)	Control Efficiency %	Controlled PTE PM10 (lbs/hr)	Controlled PTE PM10 (tpy)	PTE PM10 (lbs/hr)	PTE PM10 (tpy)
Cyclone	5600	0.07	85.00%	0.50	2.21	3.36	14.72

Methodology

Controlled PTE PM / PM10 (lbs/hr) = Inlet flow (ft³/min) * 60 (min/hr) * Inlet grain loading (grains/ft³) * (1/7000 grains/lb) * 1-control efficiency (%)
Controlled PTE PM / PM10 (tpy) = Controlled PTE PM / PM10 (lbs/hr) * 8760 (hrs/yr) * (1/2000 lbs/ton)

PTE PM / PM10 (lbs/hr) = Inlet flow (ft³/min) * 60 (min/hr) * Inlet grain loading (grains/ft³) * (1/7000 grains/lb)
PTE PM / PM10 (tpy) = Controlled PTE PM / PM10 (lbs/hr) * 8760 (hrs/yr) * (1/2000 lbs/ton)

**Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Dry Wood**

Company Name: Railworks Wood Products
Address City IN Zip: 3818 South County Road 50 East, Winslow, Indiana 47598
Permit No. 125-20663
Plt ID: 125-00034
Reviewer: Jenny Acker
Date: January 18, 2005

Capacity (Horsepower/hr)

200

Capacity (MMBtu/hr)

6.6892

Emission Factor in lb/MMBtu	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Potential Emissions in tons/yr Purchased Wood Chips	0.4	0.377	0.327	0.025	0.49	0.013	0.6
	11.72	11.05	9.58	0.73	14.36	0.38	17.58

Emission Factor in lb/MMBtu	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Potential Emissions in tons/yr	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
	1.2E-01	1.2E-01	1.3E-01	5.6E-01	5.6E-02

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

Dry wood is considered to be less than 20% moisture content.

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

Methodology

1 Hp = 3.3446⁴ Btu/hr from AP-42, Miscellaneous Data and Conversion Factors (Fifth Edition)

To convert from Horsepower capacity to MMBtu/hr capacity: Hp Rating * 3.3446⁴ (Btu/hr/hp) * 1MMBtu/10⁶ Btu

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

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

**Appendix A: Emission Calculations
Emissions Calculations
Retort Vessels**

Company Name: Railworks Wood Products
Address City IN Zip: 3818 South County Road 50 East, Winslow, Indiana 47598
Permit No. 125-20663
Plt ID: 125-00034
Reviewer: Jenny Acker
Date: January 18, 2005

Wood Treated (ft³/day) 13618

Pollutant	AP-42 Emission Factor (lbs/ft ³)	PTE (lbs/day)	PTE (lbs/yr)	PTE (tpy)
VOCs	5.80E-03	78.98	28829.31	14.41
Dibenzofuran	3.50E-05	0.48	173.97	0.09
Naphthalene	7.90E-05	1.08	392.68	0.20

Methodology

AP-42 Emission Factors from AP-42 Chp. 10.8 Fifth Edition (08/99)

PTE (lbs/day) = Wood treated (ft³/day) * AP-42 emission factor (lbs emissions / ft³ wood treated per day)

PTE (lbs/yr) = PTE (lbs/day) * 365 days/year

PTE (tpy) = PTE (lbs/day) * 365 days/year * (1/2000 lbs/ton)

**Appendix A: Emissions Calculations
HAP Emissions
Tanks 1-4**

Company Name: Railworks Wood Products
Address City IN Zip: 3818 South County Road 50 East, Winslow, Indiana 47598
Permit No. 125-20663
Plt ID: 125-00034
Reviewer: Jenny Acker
Date: January 18, 2005

Constants assumed common to all tanks	Tank 1	Tank 2	Tank 3	Tank 4
m-sub-v	172	172	172	172
true vapor pressure (tvp)	0.0589	0.0589	0.0589	0.0589
atm pressure	14.7	14.7	14.7	14.7
delta T (d-T) (F)	30.0	30.0	30.0	30.0
k-sub-c	0.1	0.1	0.1	0.1
k-sub-n	1.0	1.0	1.0	1.0
f-sub-p	1.4	1.4	1.4	1.4
tvp/(atm-tvp)	0.0040	0.0040	0.0040	0.0040

Parameters	Tank 1	Tank 2	Tank 3	Tank 4
Height (ft.)	35.0	35.0	35.0	35.0
Volume (gals.)	29610.0	29610.0	29610.0	29610.0
Diameter (ft.)	12.0	12.0	12.0	12.0
Vapor Space (vpr spc) (ft.)	15.0	15.0	15.0	15.0
Inventory Turnover (dimensionless) = n	24.65	11.82	11.82	11.82
Throughput (gals.)	730000.0	350000.0	350000.0	350000.0
C (dia. Adj't)	1.00	1.00	1.00	1.00

L(B) = Breathing Loss

L(W) = Working Loss

L(Tank Loss) = L(B) + L(W) = Total Actual VOC Emissions

$$L(B) = 2.26e-2 * m\text{-sub-v} * (tvp/atm\text{-tvp})^{0.68} * dia.^{1.73} * vpr\ spc^{0.51} * d\text{-T}^{0.5} * f\text{-sub-p} * k\text{-sub-c}$$

L(B) (in pounds/year)	130.75493	130.754935	130.75493	130.75493
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$$L(W) = 2.40e-5 * m\text{-sub-v} * tvp * n * k\text{-sub-n} * k\text{-sub-c}$$

L(W) (in pounds /year)	0.0005994	0.0002874	0.0002874	0.0002874
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L(Tank Loss) = L(B) + L(W) (in pounds/year)	130.75553	130.755222	130.75522	130.75522
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**Appendix A: Emissions Calculations
HAP Emissions
Tanks 1-4**

Company Name: Railworks Wood Products
Address City IN Zip: 2818 South County Road 50 East, Winslow, Indiana 47598
Permit No. 125-20663
Plt ID: 125-00034
Reviewer: Jenny Acker
Date: January 18, 2005

PTE HAP Emissions (pounds/year)						
Hazardous Air Pollutant	CAS Number	Tank 1	Tank 2	Tank 3	Tank 4	% of HAP in Creosote
Acrolein	107-02-8	0.0261511	0.02615104	0.026151	0.026151	0.02
Benzene	71-43-2	1.3075553	1.30755222	1.3075522	1.3075522	1.00
o-Cresol	95-48-7	0.3268888	0.32688805	0.3268881	0.3268881	0.25
m-Cresol	108-39-4	0.5883999	0.5883985	0.5883985	0.5883985	0.45
p-Cresol	106-44-5	0.6537777	0.65377611	0.6537761	0.6537761	0.50
Dibenzofuran	132-64-9	1.3075553	1.30755222	1.3075522	1.3075522	1.00
Ethylbenzene	100-41-4	0.6537777	0.65377611	0.6537761	0.6537761	0.50
Naphthalene	91-20-3	9.1528874	9.15286554	9.1528655	9.1528655	7.00
Phenol	108-95-2	1.3075553	1.30755222	1.3075522	1.3075522	1.00
Styrene	100-42-5	1.3075553	1.30755222	1.3075522	1.3075522	1.00
Toluene	108-88-3	2.6151107	2.61510444	2.6151044	2.6151044	2.00
Xylene	1330-20-7	5.2302214	5.23020888	5.2302089	5.2302089	4.00

Hazardous Air Pollutant	CAS Number	Total PTE
Acrolein	107-02-8	0.10
Benzene	71-43-2	5.23
o-Cresol	95-48-7	1.31
m-Cresol	108-39-4	2.35
p-Cresol	106-44-5	2.62
Dibenzofuran	132-64-9	5.23
Ethylbenzene	100-41-4	2.62
Naphthalene	91-20-3	36.61
Phenol	108-95-2	5.23
Styrene	100-42-5	5.23
Toluene	108-88-3	10.46
Xylene	1330-20-7	20.92

Aggregate Actual HAP Emissions (lb/yr): 97.91

**Appendix A: Emission Calculations
PM/ PM10 Emissions Calculations
Unpaved Roads**

Company Name: Railworks Wood Products
Address City IN Zip: 3818 South County Road 50 East, Winslow, Indiana 47598
Permit No. 125-20663
Plt ID: 125-00034
Reviewer: Jenny Acker
Date: January 18, 2005

** unpaved roads **

Vehicle	Round Trips/Yr	Miles per Round Trip	Vehicle Miles Traveled (VMT)/yr	Mean Weight (tons)	PM Emission Factor (E)	PM Emission Factor (E _{ext})	Eq. 1 PM Emissions (uncontrolled)	PM Emissions (controlled)
18 Wheel Tractor Trailers & other 4 Wheel Machinery	4,000	0.2	800	40.00	13.84	13.84	5.53	2.77
Total Emissions (tpy)							5.53	2.77

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch 13.2.2 (Fifth Edition, 1/95), Update 12/03
Two equations are provided for calculating emissions. The first does not consider natural mitigation due to precipitation. Equations and values from AP-42 Chp. 13.2.2 (Fifth Edition, 13/03)

Eq. 1a:

$$E = k \cdot [(s/12)^a] \cdot [(W/3)^b]$$

where E = calc. size specific emission factor (lb/VMT)
k = 4.9 (particle size multiplier for PM-10) (k= 4.9 for PM-30 or TSP)
s = 10 mean % silt content of unpaved roads
a = 0.7 Constant for PM-30 or TSP
b = 0.45 Constant for PM-30 or TSP
W = 40 mean vehicle weight (tons)

Vehicle	Round Trips/Yr	Miles per Round Trip	Vehicle Miles Traveled (VMT)/yr	Mean Weight (tons)	PM10 Emission Factor (E)	PM10 Emission Factor (E _{ext})	Eq. 1 PM10 Emissions (uncontrolled)	PM10 Emissions (controlled)
18 Wheel Tractor Trailers & other 4 Wheel Machinery	4,000	0.2	800	40.00	13.84	13.84	5.53	2.77
Total Emissions (tpy)							5.53	2.77

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch 13.2.2 (Fifth Edition, 1/95), Update 12/03
Two equations are provided for calculating emissions. The first does not consider natural mitigation due to precipitation. Equations and values from AP-42 Chp. 13.2.2 (Fifth Edition, 12/03)

Eq. 1a:

$$E = k \cdot [(s/12)^a] \cdot [(W/3)^b]$$

where E = calc. size specific emission factor (lb/VMT)
k = 1.5 (particle size multiplier for PM-10) (k= 4.9 for PM-30 or TSP)
s = 10 mean % silt content of unpaved roads
a = 0.9 Constant for PM-10
b = 0.45 Constant for PM-10
W = 40 mean vehicle weight (tons)

PM / PM10 Emissions (uncontrolled) = PM Emission Factor (E) * Vehicle Miles Traveled /yr
PM / PM10 Emissions (controlled) = PM Emission Factor (E_{ext}) * Vehicle Miles Traveled /yr

Round Trips per year based on 2 miles per hour, 8 hours a day, 5 days a week, 50 weeks a year