



TO: Interested Parties / Applicant

RE: Wood-Mizer Products, Inc. / 097-21979-00394

FROM: Felicia A. Robinson  
Administrator

## 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 fifteen (15) calendar days of the receipt 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
indygov.org/dpw

Certified Mail #: 7000 0600 0023 5186 9896

September 13, 2006

Mr. Daniel S. Litmer  
Environmental Health and Safety Manager  
Wood-Mizer Products, Inc.  
8180 W. 10<sup>th</sup> Street  
Indianapolis, IN 46214



Re: Source Specific Operation Status (SSOA),  
S097-21979-00394.

Dear Mr. Litmer:

Your application for Source Specific Operation Status was received on February 28, 2006, and has been reviewed. Based on the data submitted from November 1, 2005, and the provisions in 326 IAC 2, it has been determined that your emission source, a stationary woodworking operation, with a Standard Industrial Classification (SIC) codes of 3553, and 3567, located at 8180 West 10<sup>th</sup> Street, Indianapolis, Indiana 46214, has met the criteria under 326 IAC 2-9 required to obtain a Source Specific Operating Agreement. All terms and conditions of the previous registration are no longer in effect, and are revoked in a separate letter numbered 097-22869-00394.

Pursuant to IC 4-21.5-3-5(a) and (b), approval of this Source Specific Operating Agreement shall not be effective until fifteen (15) days from the date of this letter. The facilities and processes of this source are hereby granted Source Specific Operating Agreement provided that the following requirements of the 326 IAC 2-9 are satisfied:

**Section A:**

**I) External Combustion Operation: [326 IAC 2-9-13 (e) & (f)]**

1. The visible emissions from the external combustion unit shall not exceed twenty percent (20%) opacity in twenty-four (24) consecutive readings in a six (6) minute period. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.
2. The fuel usage for the units listed in this Source Specific Operating Agreement (SSOA) shall be limited as follows:
  - (a) The fuel usage for the units listed in this Source Specific Operating Agreement (SSOA) shall be limited to less than one thousand million cubic feet (1000 MMcf) of natural gas per year, based on a straight twelve (12) month total, and
3. The source shall keep the following records from the external combustion unit:
  - (a) The hours operated for each external combustion unit approved under this Source Specific Operating Agreement (SSOA),
  - (b) Records of the annual fuel usage for each external combustion unit approved under this SSOA, and
  - (c) Records of all routine maintenance conducted on the external combustion units approved under this SSOA.



**Department of Public Works  
Office of Environmental Services**

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
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indygov.org/dpw

These records shall be kept for a minimum period of five (5) years, and made available upon request of the IDEM, OAQ and OES.

**II) Internal Combustion Operation: [326 IAC 2-9-14 (d) & (e)]**

1. The fuel usage for the units listed in this Source Specific Operating Agreement (SSOA) shall be limited to less than one hundred sixty-five and fifty-one hundredths (165.51) kilogallons of diesel fuel per year, based on a straight twelve (12) month total.
2. The fuel usage for the units listed in this Source Specific Operating Agreement (SSOA) shall be limited to less than twelve and twenty-six hundredths (12.26) kilogallons of gasoline per year, based on a straight twelve (12) month total.
3. The source must be able to demonstrate compliance no later than thirty (30) days after receipt of a written request by IDEM, OAQ and OES. A demonstration of compliance may be documented when the following records (kept for a minimum period of five (5) years) from the internal combustion units are kept:
  - (a) The hours operated for each internal combustion unit approved under this Source Specific Operating Agreement (SSOA),
  - (b) Records of the annual fuel usage for each internal combustion unit approved under this SSOA, and
  - (c) Records of all routine maintenance conducted on the internal combustion units approved under this SSOA.

**III) Woodworking Operation: [326 IAC 2-9-4(f)]**

1. The particulate matter with a diameter less than ten (10) microns (PM10) from the woodworking operation shall not exceed one-hundredth (0.01) grain per actual cubic foot of outlet air.
2. The source shall not at any time, exhaust to the atmosphere, greater than sixty-five thousand (65,000) actual cubic feet of outlet air per minute.
3. The baghouse is in operation at all times that the woodworking equipment is in use.
4. Opacity from the baghouse does not exceed ten percent (10%).
5. Visible emissions from the baghouse are observed daily using procedures in accordance with 40 CFR 60, Appendix A, Method 22, and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (a) The baghouse shall be inspected.
  - (b) Corrective actions, such as replacing or reseating bags, are initiated when necessary.
6. The baghouse is inspected quarterly when vented to the atmosphere.
7. The source shall maintain records for at least five (5) years of the types of air pollution control devices utilized at the source, and the operation and maintenance manuals for those devices, including but not limited to documentation of the date when the baghouse is redirected indoors or to the atmosphere, quarterly inspection reports when venting to the atmosphere, visible observation reports, and records of corrective actions.
8. Compliance with the limitations of this Source Specific Operating Agreement (SSOA) shall be determined utilizing the test methods specified in 40 CFR 60, Appendix A, Methods 1-4, 22 and 201A.

**Section B: General Requirements: [326 IAC 2-9-1]**

1. The source shall provide an annual notice to the IDEM, OAQ and OES stating that the source is in operation, and certifying that its operations are in compliance with the requirements of this Source Specific Operating Agreement. The above annual notice shall be submitted to:

**IDEM, Office of Air Quality  
Compliance Data Section  
100 North Senate Avenue  
Indianapolis, IN 46204-2251**

and

**Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221**

no later than January 30 of each year, with the annual notice being submitted in the format attached.

2. Any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.
3. Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 and 40 CFR Part 63.

Any change or modification which will alter operations in such a way that it will no longer comply with the applicable restrictions and conditions of this operating agreement, must obtain the appropriate approval from the IDEM, OAQ, and OES under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, and 326 IAC 2-8, before such change may occur.

Sincerely,

Original signed by AH for,

Felicia A. Robinson  
Administrator

FAR/cmb

cc: Mindy Hahn, IDEM, OAQ  
Marion County Health Department  
Matt Mosier, OES, Air Compliance  
OES files (3)

<b>Source Specific Operating Agreement Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-9-1(d).

<b>Company Name:</b>	<b>Wood-Mizer Products, Inc.</b>
<b>Address:</b>	<b>8180 W. 10<sup>th</sup> Street</b>
<b>City, State:</b>	<b>Indianapolis, IN 46214</b>
<b>Contact Person:</b>	<b>Environmental Health &amp; Safety Manager</b>
<b>Phone #:</b>	<b>(317) 501-6091</b>
<b>SSOA #:</b>	<b>S097-21979-00394</b>

I hereby certify that Wood-Mizer Products, Inc., is still in operation and is in compliance with the requirements of this Source Specific Operating Agreement (SSOA) S097-21979-00394.

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

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

**Technical Support Document (TSD) for transitioning from  
a Registration to a SSOA**

**Source Background and Description**

<b>Source Name:</b>	Wood-Mizer Products, Inc.
<b>Source Location:</b>	8180 West 10 <sup>th</sup> Street, Indianapolis, Indiana 46214
<b>County:</b>	Marion
<b>SIC Code:</b>	3553, 3567
<b>Registration No.:</b>	097-12613-00394
<b>SSOA No.:</b>	097-21979-00394
<b>Permit Reviewer:</b>	Carmen Bugay

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the Indianapolis Office of Environmental Services (OES) has reviewed an application from Wood-Mizer Products, Inc. relating to woodworking operations.

**Permitted Emission Units and Pollution Control Equipment**

The source was registered for the following emission units and pollution control devices:

- (a) Welding operations, identified as B9, consisting of twelve (12) MIG weld stations, each with a maximum capacity of 4.5 pounds per hour (lbs/hr), one (1) aluminum MIG weld station with a maximum capacity of 4.5 pounds per hour (lbs/hr), two (2) TIG weld stations each with a maximum capacity of 4.5 pounds per hour, three (3) oxyacetylene cutters, each with a maximum capacity of 18 inches per minute, and one (1) portable arc welder, exhausting to stack B9.
- (b) Woodworking operations in the Customer Service Department, identified as B8, with a maximum capacity of 3,900 cubic feet per minute (cfm) of wood, using a cyclone and baghouse for particulate control, and vented internally.
- (c) Woodworking operations in the Wood Products Building, identified as F1, with a maximum capacity of 15,500 cubic feet per minute (cfm) of wood, using a cyclone and baghouse for particulate control, and vented internally.
- (d) Equipment testing activities, identified as B7, conducted in the Customer Service Department, with the capacity to operate five (5) 42 horse power (hp) diesel engines, and exhausting to stack B7.
- (e) Equipment testing activities, identified as H5, conducted in the Research and Development Department, with the capacity to operate three (3) 42 horse power (hp) diesel engines, exhausting to stack H5.

- (f) Gasoline and diesel dispensing activities consisting of one (1) five hundred (500) gallon gasoline tank and two (2) five hundred (500) gallon diesel tanks.
- (g) Natural gas fired space heaters with combined heat input less than ten (10) million Btu per hour (MMBtu/hr).
- (h) One (1) lead solder unit, identified as H2, with a maximum capacity of 20 pounds of lead per week, exhausting to stack H3.
- (i) Two (2) infrared bake ovens, identified as B4 and B5, with no potential to emit volatile organic compounds, exhausting to stacks B4 and B5.
- (j) Blade shaping operations, identified as H1, in which a cutting coolant continuously floods the machining interface, with no potential to emit, exhausting to H1.

### Existing Approvals

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

- (a) Existing Registration numbered R 097-12613-00394, issued on May 16, 2003.

### Justification for the Modification

With the dismantling of emission units B9, natural fired space heaters with individual heat input capacity below 10 MMBtu/hr, B4 and B5; the addition of aerosol paint spray dispensing activities, and the replacement of the control devices for emission unit F1, the overall potential to emit (PTE) of SO<sub>x</sub>, NO<sub>x</sub>, CO, PM/PM-10, VOC and HAP decreased. However, since the source replaced the control equipment (baghouse) from the Woods Product Building, emission unit F1; and it was not a like-kind replacement with an increase in air flow rate from 15,500 cfm to 42,900 cfm, this change qualifies for a modification to the registration, pursuant to 326 IAC 2-5.5-6(g).

On February 28, 2006, the source requested that a SSOA be issued under 326 IAC 2-9, in place of the modification to the registration. This request has been granted. The source will comply with 326 IAC 2-9-13 Table 1 (External Combustion), 326 IAC 2-9-14 Table 1 (Internal Combustion) and 326 IAC 2-9-4(f) (Woodworking Operations). The overall potential to emit (PTE) limitations will not exceed major source levels for all three operations combined in this SSOA. This SSOA will satisfy the overall requirement under 326 IAC 2-9-1(g).

In addition, on August 2, 2006, the source certified that lead emissions from lead soldering have decreased to below exemption levels of 326 IAC 2-1.1-3(e)(1)(G). Therefore, the H2 unit does not require inclusion in the SSOA.

#### 1) Modification changes:

Several emission units were dismantled and a control equipment was replaced since the original registration, R097-12613-00394, was issued on May 16, 2003, as follows:

#### **Deletions/Dismantled:**

- (a) Welding operations, identified as B9, consisting of twelve (12) MIG weld stations each with a maximum capacity of 4.5 pounds per hour (lbs/hr), one (1) aluminum MIG weld station with a maximum capacity of 4.5 pounds per hour (lbs/hr), two (2) TIG weld stations each with a maximum capacity of 4.5 pounds per hour, three (3) oxyacetylene cutters each with a maximum capacity of 18 inches per minute, and one (1) portable arc welder, exhausting to stack B9 (dismantled - November 2001).
- (b) Natural gas fired space heaters with combined heat input less than ten (10) million Btu per hour, MMBtu/hr, (dismantled - November 2001).

- (i) Two (2) infrared bake ovens, identified as B4 and B5, with no potential to emit volatile organic compounds, exhausting to stacks B4 and B5 (dismantled - November 2001).

**Replacements/Additions:**

- (b) Woodworking operations in the Wood Products Building, identified as F1, with a maximum capacity of 42,900 cubic feet per minute (cfm) of wood, using a cyclone and baghouse for particulate control, and vented internally (replaced existing 15,500 cfm baghouse - May 2001).
- (h) Aerosol paint spray cans dispensing activities, less than 1.5 pounds per day, exhausting internally (addition - November 2005).

**Emission Units After Modification**

- (a) Woodworking operations in the Customer Service Department, identified as B8, with a maximum capacity of 3,900 cubic feet per minute (cfm) of wood, using a cyclone and baghouse for particulate control, and vented internally.
- (b) Woodworking operations in the Wood Products Building, identified as F1, with a maximum capacity of 42,900 cubic feet per minute (cfm) of wood, using a cyclone and baghouse for particulate control, and vented internally.
- (c) Equipment testing activities, identified as B7, conducted in the Customer Service Department, with the capacity to operate five (5) 42 horse power (hp) diesel engines, and exhausting to stack B7.
- (d) Equipment testing activities, identified as H5, conducted in the Research and Development Department, with the capacity to operate three (3) 42 horse power (hp) diesel engines, exhausting to stack H5.
- (e) Gasoline and diesel dispensing activities consisting of one (1) five hundred (500) gallon gasoline tank and two (2) five hundred (500) gallon diesel tanks.
- (f) One (1) lead solder unit, identified as H2, with a maximum capacity of 0.0114 pounds of lead per hour, exhausting to stack H3.
- (g) Blade shaping operations, identified as H1, in which a cutting coolant continuously floods the machining interface, with no potential to emit, exhausting to H1.
- (h) Aerosol paint spray cans dispensing activities, less than 1.5 pounds per day, exhausting internally (addition -November 2005).

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Dimensions (feet)	Flow Rate (acfm)	Temperature (°F)
B7	B7	20	0.5 x 1.0	1600	ambient
H1	H1	10	0.3 x 1.0	NA	ambient
H3	H2	8	1.3 x 1.3	NA	ambient
H5	H5	20	0.5 x 1.0	1600	ambient

**Recommendation**

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

An application for the purposes of this review was received on November 1, 2005, and February 28, 2006. In addition, a certification of compliance with lead emissions was received on August 2, 2006. Subsequent information was received on November 7, November 8, November 16, December 7, December 9, 2005, February 22, February 23, April 5, April 18, June 19, June 29, July 27 and August 22, 2006.

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

### Emission Calculations

See Appendix A (pages 1-7) of this document for detailed emissions calculations.

### Potential To Emit of the Source Before Controls

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

Pollutant	Potential To Emit (tons/year)
PM	60.76
PM-10	60.76
SO <sub>2</sub>	7.60
VOC	7.64
CO	0.13
NO <sub>x</sub>	0.64

  

HAP	Potential To Emit (tons/year)
Combined	0.0002
Pb (Lead)	0.00011
<b>TOTAL</b>	<b>0.0002</b>

- (a) The potential to emit (PTE), as defined in 326 IAC 2-1.1-1(16)), of pollutants is less than 100 tons per year; Lead PTE is more than 0.2 and less than 5 tons per year (tpy). Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source has agreed and requested that source specific limitation restrictions and conditions be established in a Source Specific Operation Agreement (SSOA), in accordance with 326 IAC 2-9. Therefore a SSOA will be issued.
- (b) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3, 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 Marion County.

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

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard on June 15, 2004. Therefore VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emissions Offset rules under 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM-2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM-2.5 emissions, it has directed states to regulated PM-10 emissions as surrogate for PM-2.5 emissions pursuant to the nonattainment New Source Review (NSR) requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

**Source Status**

Existing Source PSD, Part 70, or FESOP 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	Less than 250
PM-10	Less than 100
SO <sub>2</sub>	Less than 250
VOC	Less than 100
CO	Less than 250
NO <sub>x</sub>	Less than 100
Single HAP	Less than 10
Combination HAPs	Less than 25

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment pollutant is emitted at a rate of 100 tons per year or greater.

**Proposed Modification**

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM* (ton/yr)	PM-10* (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Before Modification	16.63	16.63	7.63	7.59	3.81	5.02
After Modification	60.76	60.76	7.60	1.57	0.13	0.64
Increase	44.13	44.13	-0.03	-6.02	-3.68	-4.38
PSD or Offset Threshold Level	250	100	250	100	250	100

\*Note: PM=PM-10

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This modification to an existing minor stationary source is not major because the emission increase is less than the Emission Offset major source levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

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

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

**Federal Rule Applicability**

The following federal rules are applicable to the source due to this modification:

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60):
  - (1) Subpart SS (40 CFR Part 60), Standards of Performance for Industrial Surface Coating: Large Appliances, it is not included in this SSOA since the source does not perform surface coating on large appliances. No other NSPS is applicable to this source.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 20 and 40 CFR Part 61, 63):
  - (1) 40 CFR Part 63 Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) is not included in this SSOA, because this is not a major source as defined in 40 CFR part 63, Subpart A. No other NESHAP is applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Proposed Modification section.

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

This source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 2-6-1 (Emission Reporting)

This source is located in Marion County and is not required to obtain a Part 70 Permit because the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 2-9 (Source Specific Operating Agreement Program - SSOA)

The source has agreed to limit their potential to emit through a SSOA (S097-21979-00394), for the following emission operations:

##### 1) External Combustion:

- (a) fuel usage to less than 1,000 MMcf of natural gas per year, based on a straight twelve (12) month total;
- (b) recordkeeping and demonstration of compliance to be done in accordance with the SSOA (S097-21979-00394).

##### 2) Internal Combustion:

- (a) fuel usage to less than 165.51 kgal of diesel per year, based on a straight twelve (12) month total;
- (b) fuel usage is less than 12.26 kgal of gasoline per year, based on a straight twelve (12) month total
- (b) recordkeeping and demonstration of compliance to be done in accordance with the SSOA (S097-21979-00394).

##### 3) Woodworking: - Source emission unit F1 and B8

- (a) PM from woodworking operations not to exceed 65,000 actual cubic feet of outlet air per minute;
- (b) PM-10 from woodworking not to exceed 0.01 grains per actual cubic foot of outlet air;
- (c) The baghouse is in operation at all times that the woodworking equipment is in use;
- (d) Opacity from the baghouse does not exceed ten percent (10%);
- (e) Visible emissions from the baghouse are observed daily using procedures in accordance with 40 CFR 60, Appendix A, Method 22, and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (A) The baghouse shall be inspected;
  - (B) Corrective actions, such as replacing or reseating bags, are

initiated when necessary;

- (f) The baghouse is inspected quarterly when vented to the atmosphere;
- (g) Recordkeeping and compliance demonstration to be done in accordance with the SSOA (S097-21979-00394).

#### 326 IAC 5-1-1 (Opacity Limitations)

The Opacity regulation 326 IAC 5-1 is generally applicable to all point sources of emissions. However, since the source is located in Marion County, and is not located in the areas of Marion County referred to in 326 IAC 5-1-5, 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 SSOA:

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

#### State Rule Applicability - Individual Facilities

##### 326 IAC 2-1.1-3 (Exemptions)

This source will emit less than 0.2 tons per year of lead, therefore pursuant to 326 IAC 2-1.1-3 (e)(1)(G), emission unit H2 is exempt from these requirements.

##### 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

###### (a) Woods Products Building (emission unit F1)

Pursuant to 326 IAC 6-3-2(e)(1), the particulate matter from F1 shall not exceed the the pounds per hour emission rate established as E in the following formula:

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

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = 137 \text{ lb/hr process weight rate in tons per hour.} \end{array}$$

Therefore, based on the formula above, emissions shall be limited to:

$$E \text{ (lb/hr)} = 4.10 \times P \text{ (137 lb/hr} \times 1 \text{ ton/2,000 lb)}^{0.67} = 0.68 \text{ lb/hr}$$

Calculations of air emissions from this emission unit F1 showed a total of 0.68 lb/hr (less than 10 lb/hr) or 2.98 tons/yr. Since the particulate matter emitted to the atmosphere after control (baghouse) is 0.137 lb/hr, therefore, the source is in compliance with this regulation. (See Appendix A, page 5 of this TSD, for detailed calculations.)

###### (b) Customer Service Department - Woodworking operations (emission unit B8)

Calculations of PTE air emissions from this process total 0.007 pounds per hour (lb/hr) or 0.031 tons per year (ton/yr). Therefore, pursuant to 326 IAC 6-3-1(b)(14), this operation is not subject to the requirements of this rule, because Potential to Emit (PTE) is less than 0.551 lb/hr. (See Appendix A, page 6 of this TSD, for detailed calculations.)

- (c) Aerosol Paint Spray Cans Dispensing Activities  
Aerosol paint spray cans dispensing activities (less than 1.5 lb/day) are performed to repair minor surface damage and imperfections. Therefore, pursuant to 326 IAC 6-3-1(b)(12), this operation is exempt from this rule.

326 IAC 6.5-1-1 (Particulate matter limitations except Lake County)

The source does not have the potential to emit greater than 100 tons per year of particulate matter or actual emissions of greater than 10 tons per year of particulate matter; and it is not one of the sources listed in 326 IAC 6.5-6 (formerly 326 IAC 6-1-12), therefore 326 IAC 6.5-1-1 (formerly 6-1), does not apply.

326 IAC 8-2-1 (Volatile Organic Compounds (VOC) - Surface Coating Emission Limitations)

Even though the source is located in Marion County, it does not have the potential to emit of greater than 25 tons per year of VOC, therefore, pursuant to 326 IAC 8-2-1 (a), this regulation does not apply. No other 326 IAC 8 rules are applicable to this source.

326 IAC 20-14-1 (Hazardous Air Pollutants - Wood Furniture Manufacturing Operations)

The source does not meet the definition of a major source under 40 CFR Subpart JJ and Subpart A (incorporated by reference), therefore 326 IAC 20-14-1 does not apply.

**Conclusion**

These operations shall be subject to the conditions of the attached SSOA 097-21979-00394.

**Emissions Calculations  
Lead Soldering Operations**

**Company Name: Wood-Mizer Products, Inc.**  
**Address, City IN Zip: 8180 West 10th Street**  
**Operational Permit No: R 097-12613-00394**  
**Permit No.: SSOA 097-21979-00394**  
**Permit Reviewer: Carmen Bugay**  
**Date: 6/30/2006**

**Lead Soldering - Emission Unit (EU) H2**

Maximum Electrodes Usage (lb/yr)	Maximum Electrodes Usage (lb/hr)	Maximum Lead Consumption (lb Pb/lb electrodes)	Maximum Lead Consumption (lb Pb/yr)	Maximum Lead Consumption (lb Pb/hr)	Lead PTE (ton Pb/yr)
100	0.01142	0.00162	0.162	0.000018	0.000081

Note: Maximum electrodes usage as provided by the source. Lead (Pb) consumed assumed to be = lead emitted.

**Methodology**

Maximum Electrodes Usage (lb/hr) = Maximum Electrodes Usage (lb/yr) / 8,760 hours/yr

Maximum Lead Consumption (lb Pb/yr) = Maximum Electrodes Usage (lb/yr) x Maximum Lead Consumption (lb Pb/lb electrodes)

Maximum Lead Consumption (lb Pb/hr) = Maximum Electrodes Usage (lb/hr) x Maximum Lead Consumption (lb Pb/lb electrodes)

Lead PTE (ton Pb/yr) = Maximum Lead Consumption (lb Pb/hr) x 8,760 hours/year / 2,000 ton/year

**326 IAC 2-1.1-3(e)(G)**

Lead PTE of 0.000081 < 0.2 ton/yr, therefore emission unit H2 is exempt from this regulation.

**Appendix A: Emissions Calculations  
Industrial Boilers (> 100 mmBtu/hr)  
#1 and #2 Fuel Oil  
Equipment Testing Activities**

**Company Name: Wood-Mizer Products, Inc.  
Address, City IN Zip: 8180 West 10th Street  
Operational Permit No.: R 097-12613-00394  
Permit No.: SSOA 097-21979-00394  
Permit Reviewer: Carmen Bugay  
Date: 3/22/2006**

3 engines @ 42 hp = (B7) Heat Input Capacity Potential Throughput S = Weight % Sulfur  
5 engines @ 42 hp (H5) MMBtu/hr kgals/year 2  
  
0.8551 53.50608

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	3.3	284 (142.0S)	24.0	0.20	5.0
Potential Emission in tons/yr	0.088	7.598	0.642	0.005	0.134

**Methodology**

3 engines \* 42 hp / engine \* (2545 Btu/hr) / 1 hp \* (1 MMBtu/hr) / (1e6 Btu/hr) = 0.321 MMBtu/hr  
1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

**Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu**

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-02-005-01/02/03) Supplement E 9/98  
\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

**Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton**

**Appendix A: Emissions Calculations  
Industrial Boilers (> 100 mmBtu/hr)  
#1 and #2 Fuel Oil  
HAPs Emissions**

**Company Name: Wood-Mizer Products, Inc.  
Address, City IN Zip: 8180 West 10th Street  
Operational Permit No: R 097-12613-00394  
Permit No.: SSOA 097-21979-00394  
Permit Reviewer: Carmen Bugay  
Date: 3/22/2006**

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	1.50E-05	1.12E-05	1.12E-05	1.12E-05	3.37E-05

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05	Total
Potential Emission in tons/yr	1.12E-05	2.25E-05	1.12E-05	5.62E-05	1.84E-04

**Methodology**

No data was available in AP-42 for organic HAPs.

**Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton**

**Emissions Calculations  
Gasoline & Diesel Fuel Dispensing Operations**

**Company Name:** Wood-Mizer Products, Inc.  
**Address, City IN Zip:** 8180 West 10th Street  
**Operational Permit No.:** R 097-12613-00394  
**Permit No.:** SSOA 097-21979-00394  
**Permit Reviewer:** Carmen Bugay  
**Date:** 3/22/2006

<b>Unit</b>	<b>Throughput (gallons/yr)</b>	<b>Emission Rate (lb VOC / 1000 gal)</b>	<b>Potential Emissions (tons/year)</b>
Gasoline	78000	11	0.429
Diesel Fuel	78000	11	0.429
Diesel Fuel	78000	11	0.429
<b>Total</b>			<b>1.287</b>

Methodology

Potential Emissions = Emission Rate (lb of VOC/1,000 gallons) \* Throughput (gal/yr) / (1,000 gal \* 2,000 lb/ton)

**Appendix A: Emission Calculations**

**Woodworking Emission Calculations**

**Permit Number:** SSOA 097-21979-00357

**Permit Reviewer:** Carmen Bugay, 3/22/06

**PM emission calculation:**

**Emission Unit: F1**

Raw material being fed in = 137 lb/hr  
or: 0.0685 ton/hr

$$E = 4.10 \times P^{0.67}$$

where:

P = process weight rate in tons per hour

E =  $4.10 \times (0.082^{0.67}) = 0.680$  lbs/hour  
or: **2.980** ton/yr

**PTE After Control:**

**Emission Unit: F1**

Actual control efficiency of the baghouse = 99%

Amount of sawdust collected by dust collector (est. 10% of throughput) = 13.7 lbs/hr

Emission after control:  $13.7 \times (1 - 0.99) = 0.1370$  lbs/hour  
or:  $0.1370 \text{ lb/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lb} = 0.600$  ton/yr

**PTE Before Control: controlled + uncontrolled emissions = total emissions (PTE)**

**Emission Unit: F1**

$0.600 \text{ ton/yr} + (328.8 \text{ lb/day} \times 365 \text{ day/yr} \times 1 \text{ ton}/2,000 \text{ lb}) = 60.61$  ton/yr

**326 IAC 6-3-2:**

Since the potential emission after control is less than the allowable emission, the woodworking operations controlled by the baghouse, identified as F1, is in compliance with 326 IAC 6-3-2.

## Appendix A: Emission Calculations

### Woodworking Emission Calculations

Permit Number: SSOA 097-21979-00357

Page 6 of 7, TSD App A

#### PM emission calculation:

##### Emission Unit: B8

Raw material being fed in = 0.147 lb/hr  
or: 0.00007 ton/hr

$$E = 4.10 \times P^{0.67}$$

where:

P = process weight rate in tons per hour

$E = 4.10 \times (0.00007^{0.67}) = 0.007$  lbs/hour  
or:  $0.031$  ton/yr

#### PTE After Control:

##### Emission Unit: B8

Actual collection efficiency of the baghouse = 99%

Amount of sawdust collected by dust collector (est. 10% of throughput) = 0.0147 lbs/hr (0.3528 lb/day or 0.065 ton/yr)

Emission after control:  $0.0147 \times (1 - 0.99) = 0.0001$  lbs/hour  
or:  $0.0001 \text{ lb/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lb} = 0.001$  ton/yr

#### PTE Before Control:

##### Emission Unit: B8

$0.001 \text{ ton/yr} + (0.3528 \text{ lb/day} \times 365 \text{ day/yr} \times 1 \text{ ton}/2,000 \text{ lb}) = 0.0650$  ton/yr

#### 326 IAC 6-3-2:

Since the potential emission after control is less than the allowable emission, the woodworking operations controlled by the baghouse, identified as B8, is exempt from requirements of 326 IAC 6-3-2.

**Appendix A: Emission Calculations  
SUMMARY**

**Company Name:** Wood-Mizer Products, Inc.  
**Address, City IN Zip:** 8180 West 10th Street  
**Operational Permit No.:** R 097-12613-00394  
**Permit No.:** SSOA 097-21979-00394  
**Permit Reviewer:** Carmen Bugay  
**Date:** 3/22/2006

All PTE Emissions in tons/yr (ton/yr) - Before Control

Emission Units	PM*	SO2	NOx	VOC	CO	HAP	
						Combined	Single (Lead)
Equipment Testing (B7, H5)	0.088285	7.59786	0.64207	0.00535	0.13377	0.0002	0.000034
Gasoline and Diesel Fuel				1.287			
Woodworking (F1, B8)	60.6711						
Aerosol Spray Can Dispensing Activities				0.27375			
Lead Soldering							0.000081
<b>Total</b>	<b>60.76</b>	<b>7.60</b>	<b>0.64</b>	<b>1.57</b>	<b>0.13</b>	<b>0.0002</b>	<b>0.00011</b>

Note\*: PM = PM-10