



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: April 20, 2007  
RE: Pike Lumber Company, Inc./ 049-23053-00007  
FROM: Nisha Sizemore  
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 03/23/06



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Pike Lumber Company, Inc.  
719 Front Street  
Akron, Indiana 46910**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F049-23053-00007	
Issued by:Original signed by  Nisha Sizemore Permits Branch Chief Office of Air Quality	Issuance Date:April 20, 2007  Expiration Date:April 20, 2012

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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 through A.3 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 2-8-3(b)]

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The Permittee owns and operates a stationary a hardwood lumber sawing operation.

Source Address:	719 Front Street, Akron, Indiana 46910
Mailing Address:	P.O. Box 247, Akron, Indiana 46910
General Source Phone Number:	(574) 893-4511
SIC Code:	2421
County Location:	Fulton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) wood-fired boiler, identified as EU-2.1, constructed in 1988, with a maximum heat input capacity of 20.9 MMBtu/hr, equipped with a multiple-cyclone for particulate control, and exhausting to stack S-2.1.
- (b) One (1) natural gas-fired standby boiler, identified as EU-2.2, constructed in 1988, with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stack S-2.2.
- (c) Wood sawing operations, identified as EU-20.1.1, constructed in 1996, with a total throughput rate of 25.7 tons of wood per hour, controlled by a cyclone, and exhausting inside the building.
- (d) One (1) wood planer, identified as EU-20.3, constructed in 1986, with a maximum throughput rate of 9.7 tons of wood per hour, controlled by a cyclone, and exhausting to vent V 34.
- (e) One (1) wood storage silo, identified as EU-3.2, constructed in 1983, with a maximum throughput rate of 8.9 tons per hour, controlled by a cyclone.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months and are not subject to 326 IAC 20-6, constructed in 1983. [326 IAC 8-3-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Paved and unpaved roads and parking lots with public access.

- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) Other emission units, not regulated by a NESHAP, with PM<sub>10</sub>, NO<sub>x</sub>, and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
  - (1) Two (2) diesel storage tanks, with maximum capacities of 14,500 and 15,000 gallons, respectively.
  - (2) One (1) dip tank for chemical treatment, using water based solutions.
  - (3) One (1) shaving bin (fuel bin) identified as EU-3.1, constructed in 1971.
  - (4) One (1) wood fuel pile.
  - (5) Drying kilns 1-35.
  - (6) One (1) predrying process.
  - (7) Woodworking operations, including the following: [326 IAC 6-3-2]
    - (A) One (1) debarker, with a maximum throughput rate of 2,000 pounds per hour.
    - (B) One (1) sawmill chipper, with a maximum throughput rate of 175 pounds per hour per hour, equipped with a cyclone, and exhausting to the fuel bin.
    - (C) Greenchain/trimmings and hog, with a maximum throughput rate of 1,600 pounds per hour, equipped with a cyclone dust collector.
    - (D) One (1) straight line rip saw, with a maximum throughput rate of 350 pounds per hour.
    - (E) One (1) bin sorter, constructed in 2003, with a maximum throughput rate of 3,550 pounds per hour, containing trim saws and one (1) wood grinder, controlled by baghouse EFR-86-10.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- 
- (a) This permit, F049-23053-00007, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-8-6]**

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Severability [326 IAC 2-8-4(4)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (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.
- (b) A copy of the PMPs 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 PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

And

Northern Regional Office  
Telephone Number: 574- 245-4870  
Facsimile Number: 574- 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F049-23053-00007 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) Deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (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 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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 the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### 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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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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.7 Stack Height [326 IAC 1-7]

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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.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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 46204-2251

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 2-1.1-1(1).

- (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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) 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 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for 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 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.12 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.

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

#### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by

excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 facility 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 retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

---

- (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 within ninety (90) days of permit issuance.

### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and 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 46204-2251
- (c) 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS – Boilers

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) wood-fired boiler, identified as EU-2.1, constructed in 1988, with a maximum heat input capacity of 20.9 MMBtu/hr, equipped with a multiple-cyclone for particulate control, and exhausting to stack S-2.1.
- (b) One (1) natural gas-fired standby boiler, identified as EU-2.2, constructed in 1988, with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stack S-2.2.

(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 2-8-4(1)]

#### D.1.1 PM and PM10 Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2(PSD) not applicable, the Permittee shall comply with the following:

- (a) The PM emissions from boiler EU-2.1 shall not exceed 1.67 lbs/hr.
- (b) The PM10 emissions from boiler EU-2.1 shall not exceed 1.50 lbs/hr.

Combined with the PM emissions from the natural gas fire boiler (EU-2.2), the woodworking operations, and the insignificant activities, the total emissions from the entire source are limited to less than 100 tons/yr for PM10 and less than 250 tons/yr for PM. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (PSD) are not applicable.

#### D.1.2 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each of boilers EU-2.1 and EU-2.2 shall be limited to 0.40 pounds per MMBtu heat input.

The limit was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = emission rate limit (lbs/MMBtu)  
Q = total source heat input capacity (MMBtu/hr)

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control device.

### Compliance Determination Requirements

#### D.1.4 PM and PM10 Control

In order to comply with Condition D.1.1, the cyclone equipped with boiler EU-2.1 shall be in operation and control emissions from boiler EU-2.1 at all times that this unit is in operation.

#### D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM10 testing for boiler EU-2.1 within 180 days after issuance of this permit, utilizing

methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.1.6 Visible Emissions Notations**

---

- (a) Visible emission notations of the stack exhaust from boiler stack S-2.1 shall be performed once per day during normal daylight operations. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.7 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- Response to Excursions or Exceedances shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.8 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of stack S-2.1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.2 FACILITY OPERATION CONDITIONS – Woodworking Operations**

**Facility Description [326 IAC 2-8-4(10)] :**

- (c) Wood sawing operations, identified as EU-20.1.1, constructed in 1996, with a total throughput rate of 25.7 tons of wood per hour, controlled by a cyclone, and exhausting inside the building.
- (d) One (1) wood planer, identified as EU-20.3, constructed in 1986, with a maximum throughput rate of 9.7 tons of wood per hour, controlled by a cyclone, and exhausting to vent V 34.
- (e) One (1) wood storage silo, identified as EU-3.2, constructed in 1983, with a maximum throughput rate of 8.9 tons per hour, controlled by a cyclone.

(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 2-8-4(1)]**

**D.2.1 PM and PM10 Limits [326 IAC 2-2] [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2(PSD) not applicable, the PM/PM10 emissions from the woodworking operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	1.80	1.03
EU-20.3	Wood Planer	4.68	0.04
EU-3.2	Storage Silo	1.78	1.03

Combined with the PM emissions from the boilers and the insignificant activities, the total emissions from the entire source are limited to less than 100 tons/yr for PM10 and less than 250 tons/yr for PM. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (PSD) are not applicable.

**D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Maximum Process Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	25.7	36.1
EU-20.3	Wood Planer	9.70	18.8
EU-3.2	Storage Silo	8.90	17.7

The pounds per hour limitations were calculated using the following equation:

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

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

where E = rate of emission in pounds per hour and  
 P = process weight rate in tons per hour

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

### Compliance Determination Requirements

#### D.2.4 PM and PM10 Control

---

In order to comply with Conditions D.2.1 and D.2.2, the cyclones associated with the sawing operations (EU-20.1.1), the wood planer (EU-20.3), and the storage silo (EU-3.2) shall be in operation and control emissions from the woodworking operations at all times that these units are in operation.

#### D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

---

In order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform following tests:

- (a) PM and PM10 testing for the wood sawing operation (EU-20.1.1) and the storage silo (EU-3.2) within 180 days after issuance of this permit, utilizing methods as approved by the Commissioner.
- (b) PM and PM10 testing for the wood planer (EU-20.3) within five (5) years from the date of the the last valid compliance demonstration, utilizing methods as approved by the Commissioner.

PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.6 Visible Emissions Notations

---

- (a) Visible emission notations of the exhaust from woodworking operation exhausts shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.7 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- Response to Excursions or Exceedances shall be considered a deviation from this permit.

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.8 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of exhausts from the cyclones or maintain a record of the reason why the visible emission notations were not taken.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3 FACILITY OPERATION CONDITIONS – Degreasing and Woodworking Operations

#### Facility Description [326 IAC 2-8-4(10)] : Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months and are not subject to 326 IAC 20-6, constructed in 1983. [326 IAC 8-3-2]
- (e) Other emission units, not regulated by a NESHAP, with PM<sub>10</sub>, NO<sub>x</sub>, and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
  - (7) Woodworking operations, including the following: [326 IAC 6-3-2]
    - (A) One (1) debarker, with a maximum throughput rate of 2,000 pounds per hour.
    - (B) One (1) sawmill chipper, with a maximum throughput rate of 175 pounds per hour per hour, equipped with a cyclone, and exhausting to the fuel bin.
    - (C) Greenchain/trimmings and hog, with a maximum throughput rate of 1,600 pounds per hour, equipped with a cyclone dust collector.
    - (D) One (1) straight line rip saw, with a maximum throughput rate of 350 pounds per hour.
    - (E) One (1) bin sorter, constructed in 2003, with a maximum throughput rate of 3,550 pounds per hour, containing trim saws and one (1) wood grinder, controlled by baghouse EFR-86-10.

(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 2-8-4(1)]

##### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**D.3.2 Particulate Emission Limitations [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the insignificant woodworking operations shall not exceed the pounds per hour limit listed in the table below:

<b>Unit Description</b>	<b>Maximum Process Rate (lbs/hr)</b>	<b>Particulate Emission Limit (lbs/hr)</b>
Debarker	2,000	4.10
Sawmill Chipper	175	0.80
Greenchain and Hog	1,600	3.53
Rip Saw	350	1.28
Bin Sorter	3,550	6.02

The pounds per hour limitations above were calculated with the following equation:

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

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Pike Lumber Company, Inc.  
Source Address: 719 Front Street, Akron, Indiana 46910  
Mailing Address: P.O. Box 247, Akron, Indiana 46910  
FESOP Permit No.: F049-23053-00007

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Pike Lumber Company, Inc.  
Source Address: 719 Front Street, Akron, Indiana 46910  
Mailing Address: P.O. Box 247, Akron, Indiana 46910  
FESOP Permit No.: F049-23053-00007

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Pike Lumber Company, Inc.  
 Source Address: 719 Front Street, Akron, Indiana 46910  
 Mailing Address: P.O. Box 247, Akron, Indiana 46910  
 FESOP Permit No.: F049-23053-00007

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Background and Description**

Source Name:	Pike Lumber Company, Inc.
Source Location:	719 Front Street, Akron, Indiana 46910
County:	Fulton
SIC Code:	2421
Operation Permit No.:	F049-12738-00007
Operation Permit Issuance Date:	October 12, 2001
Permit Renewal No.:	F049-23053-00007
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Pike Lumber Company, Inc., relating to the operation of a hardwood lumber sawing operation. Pike Lumber Company, Inc. was issued FESOP #049-12738-00007 on October 12, 2001.

**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, identified as EU-2.1, constructed in 1988, with a maximum heat input capacity of 20.9 MMBtu/hr, equipped with a multiple-cyclone for particulate control, and exhausting to stack S-2.1.
- (b) One (1) natural gas-fired standby boiler, identified as EU-2.2, constructed in 1988, with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stack S-2.2.
- (c) Wood sawing operations, identified as EU-20.1.1, constructed in 1996, with a total throughput rate of 25.7 tons of wood per hour, controlled by a cyclone, and exhausting inside the building.
- (d) One (1) wood planer, identified as EU-20.3, constructed in 1986, with a maximum throughput rate of 9.7 tons of wood per hour, controlled by a cyclone, and exhausting to vent V 34.
- (e) One (1) wood storage silo, identified as EU-3.2, constructed in 1983, with a maximum throughput rate of 8.9 tons per hour, controlled by a cyclone.

**Unpermitted Emission Units and Pollution Control Equipment**

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

## **New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

There are no new emission units and pollution control equipment receiving New Source Review Approval at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months and are not subject to 326 IAC 20-6, constructed in 1983. [326 IAC 8-3-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) Other emission units, not regulated by a NESHAP, with PM<sub>10</sub>, NO<sub>x</sub>, and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
  - (1) Two (2) diesel storage tanks, with maximum capacities of 14,500 and 15,000 gallons, respectively.
  - (2) One (1) dip tank for chemical treatment, using water based solutions.
  - (3) One (1) shaving bin (fuel bin) identified as EU-3.1, constructed in 1971.
  - (4) One (1) wood fuel pile.
  - (5) Drying kilns 1-35.
  - (6) One (1) predrying process.
  - (7) Woodworking operations, including the following: [326 IAC 6-3-2]
    - (A) One (1) debarker, with a maximum throughput rate of 2,000 pounds per hour.

- (B) One (1) sawmill chipper, with a maximum throughput rate of 175 pounds per hour per hour, equipped with a cyclone, and exhausting to the fuel bin.
- (C) Greenchain/trimmings and hog, with a maximum throughput rate of 1,600 pounds per hour, equipped with a cyclone dust collector.
- (D) One (1) straight line rip saw, with a maximum throughput rate of 350 pounds per hour.
- (E) One (1) bin sorter, constructed in 2003, with a maximum throughput rate of 3,550 pounds per hour, containing trim saws and one (1) wood grinder, controlled by baghouse EFR-86-10.

### Existing Approvals

The source has been operating under the previous FESOP #049-12738-00007, issued on October 12, 2001. The source has since received a First Administrative Amendment No.: 049-16693-00007, issued on January 14, 2003.

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

#### Condition D.1.2 in FESOP #049-12738-00007, issued on October 12, 2001

- (a) The annual wood fuel usage in Boiler EU-2.1 is limited to 14,235 tons per 12 consecutive month period.
- (b) The emissions of carbon monoxide while burning wood shall not exceed 13.6 pounds per ton of wood. These limits are equivalent to 96.8 tons per year of carbon monoxide.
- (c) The emissions of particulate matter, while burning wood, shall not exceed 8.8 pounds per ton of wood burned. These limits are equivalent to 12.5 tons per year of particulate.
- (d) The emissions of PM<sub>10</sub>, while burning wood, shall not exceed 7.9 pounds per ton of wood burned. These limits are equivalent to 11.2 tons per year of PM<sub>10</sub>.

#### Condition D.3.2 in FESOP #049-12738-00007, issued on October 12, 2001

- (a) Pursuant to 326 IAC 2-8-4 (FESOP), the amount of wood processed in the wood saw operations shall be limited to a maximum of 225,000 tons of wood per twelve (12) consecutive months and emissions of PM<sub>10</sub> to less than 0.20 pounds per ton of wood processed. These limits are equivalent to 22.5 tons per year of PM<sub>10</sub>.
- (b) Limit emissions of PM to less than 0.35 pounds per ton of wood processed. These limits are equivalent to 39.4 tons per year of PM.

Changes to the original conditions:

Since all the woodworking operations are currently controlled by cyclones and the potential to emit PM/PM<sub>10</sub> after control from the entire source is less than 100 tons per year, the fuel usage limit for the wood fired boiler (EU-2.1) and the throughput limit for the wood saw operations are not necessary and have been removed from this FESOP renewal. The PM/PM<sub>10</sub> emission limits

for boiler EU-2.1 and the wood saw operations have been adjusted using the emission factors in AP-42 and an 80% control efficiency for cyclones (see Appendix A and the discussion in State Rule Applicability – Entire Source section for additional details). The CO emission limit for boiler EU-2.1 has been removed, since the potential to emit CO from this source is less than 100 tons per year.

### Enforcement Issue

IDEM is aware that the source did not apply for a FESOP renewal in a timely manner. IDEM is reviewing this matter and will take appropriate action. Pursuant to 326 IAC 2-8-3(h), the FESOP renewal application was required to be submitted before January 12, 2006, (9 months prior to the date of expiration of the first FESOP). However, the FESOP renewal application was received on May 4, 2006.

### Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete FESOP renewal application for the purposes of this review was received on May 4, 2006 and additional information was received on February 23, 2007 and March 2, 2007.

There was no notice of completeness letter mailed to the source.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Greater than 250
PM-10	Greater than 250
SO <sub>2</sub>	2.35
VOC	3.15
CO	64.0
NO <sub>x</sub>	55.7

HAPs	Unrestricted Potential Emissions (tons/yr)
Acrolein	0.37
Benzene	0.38
Formaldehyde	0.40
HCl	1.74
Styrene	0.17
Total	3.07

- (a) The unrestricted potential emissions of PM10 is equal to or greater than 100 tons per year. Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).
- (b) **Fugitive Emissions**  
 This type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, the fugitive emissions are not counted toward determination of PSD applicability.

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Potential to Emit After Issuance (tons/year)							
Process/Facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Wood Fired Boiler	Less than 7.32	Less than 6.59	2.29	1.56	54.9	44.9	3.07
NG Fired Boiler	0.20	0.82	0.06	0.59	9.05	10.8	Negligible
Woodworking Operations	Less than 36.2	Less than 9.21	-	-	-	-	-
Insignificant Woodworking Units	0.60	0.60	-	Less than 1.0	-	-	Negligible
Insignificant Units	Less than 1.0	Less than 1.0	-	Less than 1.0	-	-	Negligible
<b>Total Emissions</b>	<b>Less than 45.3</b>	<b>Less than 18.2</b>	<b>2.35</b>	<b>3.15</b>	<b>64.0</b>	<b>55.7</b>	<b>3.07</b>
Part 70 Program Thresholds	NA	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

**County Attainment Status**

The source is located in Fulton County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: Effective October 25, 2006, 326 IAC 1-4-1 has been revised revoking the one hour ozone standard in Indiana.

- (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 ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Fulton County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Fulton County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) Boilers EU-2.1 and EU-2.2 were constructed before June 9, 1989 and there have been no modifications to these boilers since they were constructed. Therefore, the requirements of the Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c - 60.48c, Subpart Dc) are not included in this permit.
- (c) Each of the boilers EU-2.1 and EU-2.2 has a maximum heat input capacity less than 100 MMBtu/hr. Therefore, the requirements of the New Source Performance Standards for Industrial Commercial Institutional Steam Generating Units (326 IAC 12, 40 CFR 60.40b 49b, Subpart Db) are not included in this permit.
- (d) Each of the diesel storage tanks at this source has a maximum capacity less than 75 cubic meters (19,813 gallons). Therefore, the requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb) are not included in this permit.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included in this permit.
- (f) The solvent used for the degreasing operation at this source (an insignificant activity) does not contain any halogenated HAP as specified in 40 CFR 63.460. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63.460 - 63.470, Subpart T) are not included in this permit.

### State Rule Applicability – Entire Source

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

The source was constructed in 1971 and modified in 1983, 1986, 1988, and 2003. The source is not in 1 of 28 source categories as defined in 326 IAC 2-2-1(y)(1) and the potential to emit PM/PM10 from the entire source before control is greater than 250 tons per year. The PM/PM10 emissions from this source are controlled by control devices. In order to make the source minor under 326 IAC 2-2 (PSD), the Permittee shall comply with the following:

- (a) The PM emissions from boiler EU-2.1 shall not exceed 1.67 lbs/hr.
- (b) The PM emissions from the woodworking operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	PM Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	1.80
EU-20.3	Wood Planer	4.68
EU-3.2	Storage Silo	1.78

Combined with the PM emissions from the natural gas fire boiler and the insignificant activities, the PM emissions from the entire source are limited to less than 250 tons per year. Compliance with this limit makes the source a minor source under 326 IAC 2-2 (PSD).

PM10 emissions are limited to less than the PSD major threshold by the FESOP limits (see discussion of FESOP limits below).

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

The potential to emit HAPs from the entire source is less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

#### 326 IAC 2-8-4 (FESOP)

The potential to emit before control of the entire source is greater than 100 tons per year for PM10 and less than 100 tons per year for all other criteria pollutants, less than 10 tons per year for any single HAP, and less than 25 tons per year for total HAPs. Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The PM10 emissions from boiler EU-2.1 shall not exceed 1.50 lbs/hr.
- (b) The PM10 emissions from the woodworking operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	PM10 Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	1.03
EU-20.3	Wood Planer	0.04
EU-3.2	Storage Silo	1.03

Combined with the PM10 emissions from the natural gas fired boiler and the insignificant activities, the PM10 emissions from the entire source are limited to less than 100 tons per year.

Compliance with these limits makes the requirements of 326 IAC 2-7 (Part 70 Program) not applicable and also makes the source minor for PSD.

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

This source is located in Fulton County, is not required to operate under a Part 70 permit, and has potential lead emissions that are less than five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.

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

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

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

**State Rule Applicability - Boilers**

**326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating)**

Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = emission rate limit (lbs/MMBtu)  
Q = total source heat input capacity (MMBtu/hr)

Currently, there are two (2) existing boilers at this source which were constructed in 1988. The emission rate limit for each boiler calculated from the equation above equals:

$$Pt = \frac{1.09}{(20.9 + 25.1)^{0.26}} = 0.40 \text{ lbs/MMBtu}$$

Therefore, the PM emission limit for each of the boilers EU-2.1 and EU-2.2 is 0.40 lbs/MMBtu. According to the emission calculations provided in Appendix A, these boilers should be able to comply with the limit of 0.40 lbs/MMBtu without using the PM control devices.

**326 IAC 7-1.1-2(Sulfur Dioxide Emission Limitations)**

The potential to emit SO<sub>2</sub> for each of the boilers (EU-2.1 and EU-2.2) is less than 25 tons per year. Therefore, the requirements of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) are not applicable.

**326 IAC 9-1-2 (Carbon Monoxide Emission Requirements)**

This source is not among the listed source categories in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1-2 are not applicable.

326 IAC 10-1 (Nitrogen Oxide Emission Requirements)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

**State Rule Applicability - Woodworking Operations**

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

Particulate emissions from the woodworking operations shall be limited to the emission limits listed in the table below:

Unit ID	Unit Description	Maximum Process Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	25.7	36.1
EU-20.3	Wood Planer	9.70	18.8
EU-3.2	Storage Silo	8.90	17.7

The pounds per hour limitations above were calculated with the following equation:

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

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

According to the emission calculations (see Appendix A), the uncontrolled potential to emit PM from the sawing operation and the storage silo is each less than the particulate limit above. Therefore, particulate emissions from the sawing operation and the storage silo are in compliance with the emission limits under 326 IAC 6-3-2. The cyclone for the wood planer (EU-20.3) must be used to comply with the limit for the wood planer above.

**State Rule Applicability - Degreasing Operations (Insignificant Activity)**

326 IAC 8-3-2 (Cold Cleaner Operation)

Any degreaser using VOC containing solvents is considered a cold cleaning operation. The degreasing operations at this source were constructed after January 1, 1980 and are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)**

The degreasing operations at this source were constructed before July 1, 1990. Therefore, the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) are not applicable.

**State Rule Applicability - Welding and Cutting Operations (Insignificant Activity)**

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

The welding operations at this source do not consume more than six hundred and twenty-five (625) pounds of rod or wire per day. The cutting operations at this source do not cut more than three thousand and four hundred (3,400) inches per hour of stock with one inch thickness or more. Therefore, the welding and cutting operations at this source are exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(9) and (b)(10).

**State Rule Applicability - Storage Tanks (Insignificant Activity)**

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

The gasoline fuel transfer and dispensing operation has a storage capacity less than 575 gallons. Therefore, this operation is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities).

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

This source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9-1 are not applicable to the storage tanks at this source.

**State Rule Applicability - Insignificant Woodworking Operations**

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the insignificant woodworking operations shall not exceed the pounds per hour limit listed in the table below:

Unit Description	Maximum Process Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
Debarker	2,000	4.10
Sawmill Chipper	175	0.80
Greenchain and Hog	1,600	3.53
Rip Saw	350	1.28
Bin Sorter	3,550	6.02

The pounds per hour limitations above were calculated with the following equation:

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

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

According to the emission calculations (see Appendix A), the uncontrolled potential to emit PM from each of the insignificant woodworking operations is less than the particulate limit above. The use of control device is required for these insignificant woodworking operations.

## Testing Requirements

In order to demonstrate compliance with 326 IAC 2-2 (PSD) and 326 IAC 2-8-4 (FESOP), the Permittee shall perform the following tests:

- (a) PM/PM10 tests for the wood fired boiler (EU-2.1), wood sawing operation (EU-20.1.1), and storage silo (EU-3.2) within 180 days after issuance of this permit.
- (b) PM/PM10 tests for the wood planer (EU-20.3) within five (5) years from the date of the last valid compliance demonstration.

PM-10 includes filterable and condensable PM-10.

## Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 violation 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.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The wood fired boiler EU-2.1, which is controlled by a cyclone, has applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the exhaust from boiler stack S-2.1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee or contractor is a person who has worked or trained 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. Section C - Response to Excursions or Exceedances 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (b) 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- Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the cyclone must operate properly at all times boiler EU-2.1 is in operation to ensure compliance with 326 IAC 2-2 (PSD) and 326 IAC 2-8-4 (FESOP).

2. The sawing operations (EU-20.1.1), the wood planer (EU-20.3), and the storage silo (EU-3.2), which are controlled by cyclones, have applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the exhaust from woodworking operation exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee or contractor is a person who has worked or trained 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. Section C - Response to Excursions or Exceedances 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (b) 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- Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the cyclones associated with the sawing operations (EU-20.1.1), the wood planer (EU-20.3), and the storage silo (EU-3.2) must operate properly at all times when these units are in operation to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8-4 (FESOP), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

## Conclusion

The operation of this hardwood lumber sawing operation shall be subject to the conditions of the FESOP Renewal No. 049-23053-00007.

**Appendix A: Emission Calculations  
From the Wood Fired Boiler (EU-2.1)**

**Company Name: Pike Lumber Company, Inc.  
Address: 719 Front St., Akron, IN 46910  
FESOP Renewal #: 049-23053-00007  
Reviewer: ERG/YC  
Date: March 2, 2007**

Heat Input Capacity  
MMBtu/hr

20.9

Emission Factor in lbs/MMBtu	Pollutant					
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	0.40	0.36	0.025	0.49	0.017	0.60
<b>PTE before Control (tons/yr)</b>	<b>36.6</b>	<b>33.0</b>	<b>2.29</b>	<b>44.9</b>	<b>1.56</b>	<b>54.9</b>
<b>Cyclone Control Efficiency</b>	<b>80%</b>	<b>80%</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>PTE after Control (tons/yr)</b>	<b>7.32</b>	<b>6.59</b>	<b>2.29</b>	<b>44.9</b>	<b>1.56</b>	<b>54.9</b>

Note: Emission factors are from AP-42, Chap 1.6, Wood Residue Combustion, Tables 1.6-1, 1.6-2, and 1.6-3 (09/03), and are the emission factors for dry wood combustion.

**Methodology**

PTE before Control (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

PTE after Control (tons/yr) = PTE before Control (tons/yr) x (1 - Control Efficiency)

**Appendix A: Emission Calculations  
HAP Emissions  
From the Wood Fired Boiler (EU-2.1)**

**Company Name: Pike Lumber Company, Inc.  
Address: 719 Front St., Akron, IN 46910  
FESOP Renewal #: 049-23053-00007  
Reviewer: ERG/YC  
Date: March 2, 2007**

Heat Input Capacity  
MMBtu/hr

20.9
------

	Pollutant					
Emission Factor in lbs/MMBtu	Acrolein 4.00E-03	Benzene 4.20E-03	Formaldehyde 4.40E-03	HCl 1.90E-02	Styrene 1.90E-03	Total
<b>Potential to Emit in tons/yr</b>	<b>0.37</b>	<b>0.38</b>	<b>0.40</b>	<b>1.74</b>	<b>0.17</b>	<b>3.07</b>

Note: Emission factors are the top five HAP emission factors for wood combustions and the emission factors are from AP-42, tables 1.6-3 and 1.6-4 (09/03).

**Methodology**

Potential to Emit (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From the Natural Gas Fired Boiler (EU-2.2)**

**Company Name: Pike Lumber Company, Inc.  
Address: 719 Front St., Akron, IN 46910  
FESOP Renewal #: 049-23053-00007  
Reviewer: ERG/YC  
Date: March 2, 2007**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMSCF/yr

25.1

215.6

	Pollutant					
Emission Factor in lbs/MMSCF	PM	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	1.9	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.20</b>	<b>0.82</b>	<b>0.06</b>	<b>10.8</b>	<b>0.59</b>	<b>9.05</b>

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

\*\*Emission factors for NO<sub>x</sub>: Uncontrolled = 100 lbs/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 07/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

**Methodology**

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lbs/MMSCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
PM and PM10 Emissions  
From the Woodworking Operations**

Company Name: Pike Lumber Company, Inc.  
Address: 719 Front St., Akron, IN 46910  
FESOP Renewal #: 049-23053-00007  
Reviewer: ERG/YC  
Date: March 2, 2007

**1. Potential to Emit PM**

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Uncontrolled PM Emission Factor* (lbs/ton)	PTE of PM before Control (lbs/hr)	PTE of PM before Control (tons/yr)	Control Device	Control Efficiency*	PTE of PM after Control (lbs/hr)	PTE of PM after Control (tons/yr)
EU-20.1.1	Wood Sawing Operations	25.7	0.35	9.00	39.4	Cyclone	80%	1.80	7.88
EU-20.3	Wood Planer	9.70	2.41	23.4	102	Cyclone	80%	4.68	20.5
EU-3.2	Storage Silo	8.90	1.00	8.90	39.0	Cyclone	80%	1.78	7.80
<b>Total</b>					<b>181</b>				<b>36.2</b>

\* The emission factors for the wood sawing operations and the storage silo were provided by the source and will be verified by stack testing.  
The uncontrolled emission factor for the wood planer is based on the stack test results in 2004 and assuming 80% control of cyclone.

**Methodology**

PTE before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton)  
PTE before Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs  
PTE after Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x (1-Control Efficiency)  
PTE after Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs x (1-Control Efficiency)

**2. Potential to Emit PM10**

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	PM10 Emission Factor* (lbs/ton)	PTE of PM10 before Control (lbs/hr)	PTE of PM10 before Control (tons/yr)	Control Device	Control Efficiency*	PTE of PM10 after Control (lbs/hr)	PTE of PM10 after Control (tons/yr)
EU-20.1.1	Wood Sawing Operations	25.7	0.2000	5.14	22.5	Cyclone	80%	1.03	4.50
EU-20.3	Wood Planer	9.70	0.0215	0.2	0.91	Cyclone	80%	0.04	0.18
EU-3.2	Storage Silo	8.90	0.5800	5.16	22.6	Cyclone	80%	1.03	4.52
<b>Total</b>					<b>46.0</b>				<b>9.21</b>

\* The emission factors for the wood sawing operations and the storage silo were provided by the source and will be verified by stack testing.  
The uncontrolled emission factor for the wood planer is based on the 2004 stack test results and assume an 80% control efficiency for the cyclone.

**Methodology**

PTE before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton)  
PTE before Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs  
PTE after Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x (1-Control Efficiency)  
PTE after Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs x (1-Control Efficiency)

**Appendix A: Emission Calculations  
PM and PM10 Emissions  
From the Insignificant Woodworking Operations**

**Company Name: Pike Lumber Company, Inc.  
Address: 719 Front St., Akron, IN 46910  
FESOP Renewal #: 049-23053-00007  
Reviewer: ERG/YC  
Date: March 2, 2007**

**1. PTE of the Debarker**

Unit Description	Max. Throughput Rate (lbs/hr)	Uncontrolled PM/PM10 Emission Factor*	PTE of PM/PM10 (lbs/hr)	PTE of PM/PM10 (tons/yr)
debarker	2,000	0.024	0.02	0.11

\* The emission factor is from AP-42, 4th edition.

**Methodology**

PTE (lbs/hr) = Maximum Throughput (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)

PTE (tons/yr) = Maximum Throughput (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs

**2. PTE of Other Insignificant Woodworking Units**

Unit Description	Max. Throughput Rate (lbs/hr)	Max. Throughput Rate (cf/hr)	Uncontrolled PM/PM10 Emission Factor (lbs/1000 cf)	PTE of PM/PM10 (lbs/hr)	PTE of PM/PM10 (tons/yr)
sawmill chipper*	175	2.59	0.41	1.06E-03	4.66E-03
greenchain and hog*	1,600	23.7	0.41	9.72E-03	4.26E-02
rip saw*	350	5.19	0.41	2.13E-03	9.32E-03
bin sorter	3,550	52.6	1.90	0.10	0.44
<b>Total</b>					<b>0.49</b>

\* The emission factor for these units is from AP-42, Table 10.9-7 (11/02).

\*\* The emission factor for the bin sorter was provided by the source based on the saw dust collected at the baghouse for this unit.

**Methodology**

Max. Throughput Rate (cf/hr) = Max. Throughput Rate (lbs/hr) / (5.6 lbs/bf) x 0.083 cf/bf

PTE (lbs/hr) = Maximum Throughput (cf/hr) /1000 x Emission Factor (lbs/1000 cf)

PTE (tons/yr) = PTE (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs