



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: January 19, 2007  
RE: PalletOne of Indiana, Inc. / 087-23106-00023  
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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.idem.IN.gov

## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**PalletOne of Indiana, Inc.  
5345 West 200 North  
Shipshewana, IN 46565**

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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.

Operation Permit No.: T087-23106-00023	
Issued by:	Issuance Date: January 19, 2007
<i>Original document signed by</i>	Expiration Date: January 19, 2012
Nisha Sizemore, Branch Chief Office of Air Quality	

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY .....</b>	<b>5</b>
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B</b>	<b>GENERAL CONDITIONS .....</b>	<b>7</b>
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]	
B.3	Term of Condition [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>17</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.7	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.8	Compliance Requirements [326 IAC 2-1.1-11]	

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.13 Emergency Reduction Plan [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - ..... 24**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.4 Visible Emissions Notations
- D.1.5 Cyclone Inspections
- D.1.6 Cyclone Failure Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.7 Record Keeping Requirements

**D.2 FACILITY OPERATION CONDITIONS - Woodworking operations..... 27**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Particulate Matter Limitations (PM) [326 IAC 6-3-2]
- D.2.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.4 Visible Emissions Notations

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.2.5 Record Keeping Requirements

<b>Certification .....</b>	<b>29</b>
<b>Emergency Occurrence Report .....</b>	<b>30</b>
<b>Quarterly Deviation and Compliance Monitoring Report .....</b>	<b>32</b>

## 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 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

---

The Permittee owns and operates a stationary woodworking source

Responsible Official:	Plant Manager
Source Address:	5345 West 200 North, Shipshewana, IN 46565
Mailing Address:	5345 West 200 North, Shipshewana, IN 46565
General Source Phone Number:	260-768-4021
SIC Code:	2421, 2448, 2426
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

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

- (a) One (1) woodworking operation, identified as North Saw Mill, constructed in 1985, processing a maximum of eight thousand (8,000) pounds per hour, with particulate matter emissions from the jump saw controlled by the Warehouse cyclone and with particulate matter emissions from the edger and head rig remaining uncontrolled;
- (b) One (1) woodworking operation, identified as South Saw Mill, constructed in 1976, processing a maximum of eight thousand (8,000) pounds per hour, with particulate matter emissions from the jump saw controlled by the South Saw Mill – Saw Shop Section cyclone and with particulate matter emissions from the chipper, edger and head rig remaining uncontrolled;
- (c) One (1) woodworking operation, identified as South Saw Mill – Saw Shop Section, constructed in 1971, processing a maximum of four thousand (4,000) pounds per hour, and equipped with a cyclone to control emissions from all equipment as well as the jump saw in the South Saw Mill;
- (d) One (1) woodworking operation, identified as Warehouse Shop, constructed in 1980, processing a maximum of one thousand (1,000) pounds per hour, and equipped with a cyclone to control emissions from all equipment as well as the jump saw in the North Saw Mill;
- (e) One (1) woodworking operation, identified as Debarker, constructed in 1976, processing a maximum of sixteen thousand (16,000) pounds per hour, with particulate emissions uncontrolled;
- (f) One (1) woodworking operation, identified as Hammer Mill, constructed in 1991, processing a maximum of ten thousand (10,000) pounds per hour, with particulate emissions uncontrolled;

- (g) One (1) wood-fire boiler, identified as South Boiler, constructed in 1980, with a maximum rating of 3.15 million British thermal units per hour; and
- (h) One (1) wood-fired boiler, identified as North Boiler, constructed 1991, with a maximum rating of 8.3 million British thermal units per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including one (1) No. 2 fuel oil boiler, identified as BO3, constructed in 2002, with a maximum heat capacity of 1.47 MMBtu/hr.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

---

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]**

- (a) This permit, 087-23106-00023, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

---

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 2-7-7]**

---

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 2-7-5(5)]**

---

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 2-7-5(6)(D)]**

---

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

### **B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

---

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

---

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

- (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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(9) 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 2-7 and any other applicable rules.
  - (g) 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.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this

permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

---

- (a) All terms and conditions of permits established prior to 087-23106-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,

- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

---

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 2-7-3 and 326 IAC 2-7-4(a).

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

---

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

---

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-9(a)(3)]

- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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 Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
[326 IAC 2-7-12(b)(2)]

---

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at in 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]**

---

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

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

- 
- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]**

---

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

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

##### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

---

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

---

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

**C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

---

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.13 Emergency Reduction Plan [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. (326 IAC 1-5-3)

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

- (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;
  - (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 2-7-5][326 IAC 2-7-6]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain at minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (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.18 General Reporting Requirements [326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) woodworking operation, identified as North Saw Mill, constructed in 1985, processing a maximum of eight thousand (8,000) pounds per hour, with particulate matter emissions from the jump saw controlled by the Warehouse cyclone and with particulate matter emissions from the edger and head rig remaining uncontrolled;
- (b) One (1) woodworking operation, identified as South Saw Mill, constructed 1976, processing a maximum of eight thousand (8,000) pounds per hour, with particulate matter emissions from the jump saw controlled by the South Saw Mill – Saw Shop Section cyclone and with particulate matter emissions from the chipper, edger and head rig remaining uncontrolled;
- (c) One (1) woodworking operation, identified as South Saw Mill – Saw Shop Section, constructed in 1971, processing a maximum of four thousand (4,000) pounds per hour, and equipped with a cyclone to control emissions from all equipment as well as the jump saw in the South Saw Mill;
- (d) One (1) woodworking operation, identified as Warehouse Shop, constructed in 1980, processing a maximum of one thousand (1,000) pounds per hour, and equipped with a cyclone to control emissions from all equipment as well as the jump saw in the North Saw Mill;
- (e) One (1) woodworking operation, identified as Debarker, constructed in 1976, processing a maximum of sixteen thousand (16,000) pounds per hour, with particulate emissions uncontrolled;
- (f) One (1) woodworking operation, identified as Hammer Mill, constructed in 1991, processing a maximum of ten thousand (10,000) pounds per hour, with particulate emissions uncontrolled;

(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 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes) the allowable particulate emission rate from the woodworking facility shall not exceed 34 pounds per hour when operating at a process weight rate of 23.5 tons per hour.

The pounds per hour limitation was 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;

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

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility.

## **Compliance Determination Requirements**

### **D.1.3 Particulate Matter (PM)**

---

In order to comply with D.1.1, the Warehouse and Saw Shop Section cyclones shall be in operation and control PM emissions from the woodworking facilities at all times that the woodworking facilities are in operation.

## **Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

---

### **D.1.4 Visible Emissions Notations**

---

- (a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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.1.5 Cyclone Inspections**

---

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

### **D.1.6 Cyclone Failure Detection**

---

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions). Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation of this permit.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.7 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the cyclone stacks exhaust.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 and the dates the vents are redirected.

- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (g) One (1) wood-fired boiler, identified as South Boiler, constructed in 1980, with a maximum rating of 3.15 million British thermal units per hour; and
- (h) One (1) wood-fired boiler, identified as North Boiler, constructed in 1991, with a maximum rating of 8.3 million British thermal units per hour.

### Insignificant Activities:

- (a) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including one (1) No. 2 fuel oil boiler, identified as BO3, constructed in 2002, with a maximum heat capacity of 1.47 MMBtu/hr.

(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 2-7-5(1)]

#### D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), the particulate matter emissions from the South Boiler shall be limited to 0.6 pounds per million British thermal units heat input.

#### D.2.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the North Boiler shall be limited to 0.58 pounds per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the No. 2 fuel oil boiler (BO3) shall be limited to 0.56 pounds per million British thermal units heat input.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.4 Visible Emissions Notations

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

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – 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.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.5 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of once per day visible emission notations of the wood-fired boiler stack exhaust.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: PalletOne of Indiana, Inc.  
Source Address: 5346 West 200 South, Shipshewana, Indiana 46565  
Mailing Address: 5346 West 200 South, Shipshewana, Indiana 46565  
Part 70 Permit No.: T087-23106-00023

**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:

Phone:

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**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: PalletOne of Indiana, Inc.  
Source Address: 5346 West 200 South, Shipshewana, Indiana 46565  
Mailing Address: 5346 West 200 South, Shipshewana, Indiana 46565  
Part 70 Permit No.: T087-23106-00023

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li><input type="checkbox"/> 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><input type="checkbox"/> 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
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.

Title/Position:
-----------------

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: PalletOne of Indiana, Inc.  
 Source Address: 5346 West 200 South, Shippshewana, Indiana 46565  
 Mailing Address: 5346 West 200 South, Shippshewana, Indiana 46565  
 Part 70 Permit No.: T087-23106-00023

**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  
Part 70 Operating Permit Renewal**

**Source Background and Description**

<b>Source Name:</b>	<b>PalletOne of Indiana, Inc.</b>
<b>Source Location:</b>	<b>5345 West 200 North, Shipshewana, IN 46565</b>
<b>County:</b>	<b>LaGrange</b>
<b>SIC Code:</b>	<b>2421, 2448, 2426</b>
<b>Operation Permit No.:</b>	<b>T087-12941-00023</b>
<b>Operation Permit Issuance Date:</b>	<b>March 19, 2002</b>
<b>Permit Renewal No.:</b>	<b>T087-23106-00023</b>
<b>Date:</b>	<b>August 17, 2006</b>
<b>Permit Reviewer:</b>	<b>MLE</b>

The Office of Air Quality (OAQ) has reviewed a renewal Part 70 permit renewal application from PalletOne of Indiana, Inc. relating to the operation of a wood pallet and skid manufacturing plant.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) woodworking operation, identified as North Saw Mill, constructed in 1985, processing a maximum of eight thousand (8,000) pounds per hour, with particulate matter emissions from the jump saw controlled by the Warehouse cyclone and with particulate matter emissions from the edger and head rig remaining uncontrolled.
- (b) One (1) woodworking operation, identified as South Saw Mill, constructed in 1976, processing a maximum of eight thousand (8,000) pounds per hour, with particulate matter emissions from the jump saw controlled by the South Saw Mill – Saw Shop Section cyclone and with particulate matter emissions from the chipper, edger and head rig remaining uncontrolled;
- (c) One (1) woodworking operation, identified as South Saw Mill – Saw Shop Section, constructed in 1971, processing a maximum of four thousand (4,000) pounds per hour, and equipped with a cyclone to control emissions from all equipment as well as the jump saw in the South Saw Mill;
- (d) One (1) woodworking operation, identified as Warehouse Shop, constructed in 1980, processing a maximum of one thousand (1,000) pounds per hour, and equipped with a cyclone to control emissions from all equipment as well as the jump saw in the North Saw Mill;
- (e) One (1) woodworking operation, identified as Debarker, constructed in 1976, processing a maximum of sixteen thousand (16,000) pounds per hour, with particulate emissions uncontrolled;
- (f) One (1) woodworking operation, identified as Hammer Mill, constructed in 1991, processing a maximum of ten thousand (10,000) pounds per hour, with particulate emissions uncontrolled;

- (g) One (1) wood-fired boiler, identified as South Boiler, constructed in 1980, with a maximum rating of 3.15 million British thermal units per hour; and
- (h) One (1) wood-fired boiler, identified as North Boiler, constructed in 1991, with a maximum rating of 8.3 million British thermal units per hour.

### **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 advanced source modification approval during this review process.

### **Insignificant Activities**

- (a) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including one (1) No. 2 fuel oil boiler, identified as BO3, constructed in 2002, with a maximum heat capacity of 1.47 MMBtu/hr.

### **Existing Approvals**

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

- (a) Title V 087-12941-00023, issued on March 19, 2002
- (b) First Administrative Amendment 087-16657-00023, issued on November 12, 2002
- (c) Second Administrative Amendment 087-20714-00023, issued on April 8, 2005

All conditions from previous approvals were incorporated into this Part 70 permit.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the renewal Part 70 permit 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 Part 70 permit application for the purposes of this review was received on May 18, 2006.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 6).

**Potential to Emit of the Source**

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

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

Pollutant	Potential to Emit (tons/year)
PM	206.28
PM <sub>10</sub>	205.13
SO <sub>2</sub>	1.25
VOC	1.91
CO	30.09
NOx	11.03

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
TOTAL	Less than 10 for a single HAP Less than 25 for a combination of HAPS

- (a) The potential to emit (as defined in 326 IAC 2-1.1(16)) of PM/PM<sub>10</sub> is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
 Pursuant to 326 IAC 2-7-2(e) all fugitive emissions are included in determining the applicability of Title V.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	16
PM <sub>10</sub>	16
SO <sub>2</sub>	1
VOC	2
CO	24
NOx	9
Lead	0

## County Attainment Status

The source is located in Lagrange County.

Pollutant	Status
PM <sub>2.5</sub>	Attainment
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NOx	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

**Note:** On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) LaGrange County has been classified as unclassifiable or 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 surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (c) LaGrange County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NOx, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (d) **Fugitive Emissions**  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits of the significant emission units after controls. The control equipment is considered federally enforceable after issuance the original Part 70 Operating Permit.

Limited Potential To Emit (tons/year)						
PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NOx	HAPs
165.47	164.32	1.25	1.91	30.09	11.03	< than 10 tons single < than 25 tons total
Less than 250	Less than 250	1.25	1.91	30.09	11.03	

This source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and is not one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Federal Rule Applicability**

- (a) 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) does not apply to this source because neither of the two wood-fired boilers, constructed in 1980 and 1991, have input rates greater than 10 million British thermal units per hour.
- (b) 326 IAC 14 and 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPs) is not included in this permit for this source, because this source is not a major source for Hazardous Air Pollutants (HAP).
- (c) 326 IAC 20 and 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) does not apply to this source because this source is not a major source for Hazardous Air Pollutants (HAPs).

- (d) 40 CFR 63, Subpart DDDDD is not applicable to sources that are minor sources of Hazardous Air Pollutants (HAPs).
- (e) 40 CFR 64 (Compliance Assurance Monitoring) the requirements of 40 CRF Part 64, are not applicable to any units of this source because no individual unit has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved.

### State Rule Applicability – Entire Source

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

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is required to have a Part 70 operating permit. In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted by July 1 beginning in 2004 and every three (3) years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 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 – Woodworking Facilities

#### 326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes) the allowable particulate emission rate from the woodworking facility shall not exceed 34 pounds per hour when operating at a process weight rate of 23.5 tons per hour.

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:

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

The Warehouse cyclones and Saw Shop Section cyclones shall be in operation at all times the woodworking facilities are in operation, in order to comply with this limit.

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

The Permittee shall not allow fugitive dust to escape beyond 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). 326 IAC 6-4-2(4) is not federally enforceable.

### State Rule Applicability – Wood-fired boilers

#### 326-IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)

The South Boiler is subject to 326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating) because it was constructed in 1980 which is before the date of September 21, 1983. Pursuant to 326 IAC 6-2-3(e), the particulate matter emissions from the South Boiler shall be limited to 0.6 pounds per million British thermal units heat input because the boiler

has a maximum heat capacity of less than two hundred fifty (250) million British thermal units of heat input. This limit is the lesser of 0.6 pounds per million British thermal units input and the limit calculated with the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{(50)(0.67)(40)}{(76.5)(3.15)^{0.75}(1)^{0.25}} = 7.41 \text{ lb/MMBtu}$$

where C = 50 u/m<sup>3</sup>  
Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)  
Q = Total source maximum operating capacity (3.15 MMBtu/hr)  
N = Number of stacks (1)  
a = Plume rise factor (0.67)  
h = Stack height (40 ft)

#### 326-IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The North Boiler is subject to 326 IC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating) because it was constructed in 1991 which is after the applicability date of September 21, 1983 for this rule. Pursuant to this rule, the particulate matter emissions from the North Boiler shall be limited to 0.58 pounds per million British thermal units heat input. This limit was calculated with the following equation:

$$Pt = \frac{109}{Q^{0.26}} = 0.58 \text{ lb/MMBtu}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input;  
and  
Q = Total source maximum operating capacity (8.3 + 3.15 = 11.45 MMBtu/hr)

#### 326-IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The No. 2 fuel oil boiler (BO3) is subject to 326 IC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating) because it was constructed in 2002 which is after the applicability date of September 21, 1983 for this rule. Pursuant to this rule, the particulate matter emissions from BO3 shall be limited to 0.56 pounds per million British thermal units heat input. This limit was calculated with the following equation:

$$Pt = \frac{109}{Q^{0.26}} = 0.56 \text{ lb/MMBtu}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input;  
and  
Q = Total source maximum operating capacity (8.3 + 3.15 + 1.47 = 12.92 MMBtu/hr)

#### 326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

The Fuel oil-fired combustion source (BO3) is not subject to the requirement of 326 IAC 7-1.1-2 because BO3 has the potential to emit less than 25 tons per year of SO<sub>2</sub>.

### Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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.

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

1. The woodworking facilities have applicable compliance monitoring conditions as specified below:
  - (a) Visible emissions notations of the woodworking facilities stacks exhaust shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, reading shall be taken during the part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. 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.
  - (b) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months or redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
  - (c) In the event the cyclone failure has been observed: failed units and the associated process shall 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).

These monitoring conditions are necessary because the cyclones for the woodworking facilities must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes), 326 IAC 2-7 (Part 70), and 326 IAC 2-2 (Prevention of Significant Deterioration).

2. The wood-fired boilers have applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of the wood-fired boiler stacks exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shutdown time. In the case of batch or discontinuous operations, readings shall be taken during that time of the operations that would normally be expected to cause the

greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. 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.

These monitoring conditions are necessary because the combination knock out box and settling chamber for the boiler must operate properly to ensure compliance with 326 IAC 6-2 (Source of Indirect Heating), 326 IAC 2-7 (Part 70 Permit), and 326 IAC 2-2 (Prevention of Significant Deterioration).

### **Conclusion**

The operation of this woodworking source shall be subject to the conditions of the attached proposed Part 70 Permit No T087-23106-00023.

**Appendix A: Emission Summary**

**Company Name:** PalletOne of Indiana, Inc.  
**Address City IN Zip:** 5346 West 200 North, Shipshewana, IN 46565  
**Permit NO:** 087-23106  
**Plt ID:** 087-00023  
**Reviewer:** Marcia Earl  
**Date:** August 7, 2006`

**Uncontrolled Emissions**

Emission Units	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NOx	HAPs
Woodworking without control devices	141.71	141.71					< than 10 tons single < than 25 tons total
Woodworking with control devices	48.02	48.02					
South and North Boiler	16.55	15.4	1.25	1.91	30.09	11.03	
<b>Total</b>	206.28	205.13	1.25	1.91	30.09	11.03	

uncontrolled woodworking emissions assumed to be 148.92 - 7.21 = 141.71

**Controlled Emissions**

Emission Units	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NOx	HAPs
Woodworking without control devices	141.71	141.71					< than 10 tons single < than 25 tons total
Woodworking with control devices	7.21	7.21					
South and North Boiler	16.55	15.4	1.25	1.91	30.09	11.03	
<b>Total</b>	165.47	164.32	1.25	1.91	30.09	11.03	

\* All woodworking facilities are limited by 326 IAC 6-3-2 at 34 lb/hr, which is equivalent to 148.92 tpy.

**Appendix A: Emissions Calculations**  
**External Combustion Boilers - Commercial/Institutional**  
**Wood Waste Combustion (wet wood-fired boiler, uncontrolled)**  
**South and North Boilers**

**Company Name:** PalletOne of Indiana, Inc.  
**Address City IN Zip:** 5346 West 200 North, Shipshewana, IN 46565  
**Permit No:** 087-23106  
**Pit ID:** 097-00023  
**Reviewer:** Marcia Earl  
**Date:** August 7, 2006`

Heat Input Capacity

11.45 MMBtu/hr

Emission Factor in lb/MMBtu	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
	0.33	0.307	0.267	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	16.55	15.4	13.39	1.25	11.03	1.91	30.09

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

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

\*\*The CO emission factor is for stokers and dutch ovens/fuel cells.

**Methodology**

All emission factors are based on normal firing for a fuel cell/dutch over type boiler

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10<sup>6</sup> Btu) x 2000 lbs/1 ton  
Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

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

**Appendix A: HAPs Emissions Calculations  
 External Combustion Boilers - Commercial/Institutional  
 Wood Waste Combustion (wet wood-fired boiler, uncontrolled)  
 South and North Boilers**

**Company Name:** PalletOne of Indiana, Inc.  
**Address City IN Zip:** 5346 West 200 North, Shipshewana, IN 46565  
**Permit NO:** 087-23106  
**Plt ID:** 087-00023  
**Reviewer:** Marcia Earl  
**Date:** August 7, 2006

Heat Input Capacity  
 11.45 MMBtu/hr

	<b>Acrolein</b>	<b>Benzene</b>	<b>Formaldehyde</b>	<b>Hydrogen Chloride</b>	<b>Styrene</b>
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emissions in tons/yr	2.0E-01	2.1E-01	2.2E-01	9.5E-01	9.5E-02

All emission factors are based on normal firing for a fuel cell/dutch over type boiler.

Emission Factors are from AP-42 Chapter 1.6 (Supplement G, 7/01), SCC's #1-OX-009-YY = 1 for utilities, 2 for industrial, and 3 for commercial /institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers  
 Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

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

These factors include the five HAPs with the highest AP-42 emission factors.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.6.

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

**Company Name:** PalletOne Of Indiana, Inc.  
**Address, City IN Zip:** 5346 West 200 North, Shipshewana, IN 46565  
**Permit Number:** 087-23106  
**Plt ID:** 097-00023  
**Reviewer:** Marcia Earl  
**Date:** August 7, 2006

Heat Input Capacity                      Potential Throughput                      S = Weight % Sulfur  
MMBtu/hr                                      kgals/year                                      <0.5

1.47    91.98

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	0 (157S)	24.0	0.20	5.0
Potential Emission in tons/yr	0.1	0.0	1.1	0.0	0.2

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

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

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-02-005-01/02/03) Supplement E 9/98

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

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

**Company Name:** PalletONE of Indiana, Inc.  
**Address, City IN Zip:** 5346 West 200 North, Shipshewana, IN 46565  
**Permit Number:** 087-23106  
**Plt ID:** 097-00023  
**Reviewer:** Marcia Earl  
**Date:** August 7, 2006

	HAPs - Metals				
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	2.58E-05	1.93E-05	1.93E-05	1.93E-05	5.79E-05

	HAPs - Metals (continued)			
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.93E-05	3.86E-05	1.93E-05	9.66E-05

**Methodology**

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

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

**Appendix A: Woodworking Emissions Calculations**

**Company Name:** PalletOne of Indiana, Inc.  
**Address City IN Zip:** 5346 West 200 North, Shipshewana, IN 46565  
**Permit No:** 087-23106-00023  
**Reviewer:** Marcia Earl  
**Date:** August 7, 2006

PM/PM<sub>10</sub> Emissions

Unit	Air Flow Rate (acfm)	Outlet Grain Loading (gr/ascf)	Cyclone Control Efficiency (%)	PM/PM <sub>10</sub> Uncontrolled Emissions (tons/yr)	PM/PM <sub>10</sub> Controlled Emissions (tons/yr)
South Saw Mill	4,600	0.01	85.00%	11.50	1.73
South Saw Mill - Saw Shop Section	4,600	0.01	85.00%	11.50	1.73
Warehouse Shop and North Saw Mill	10,000	0.01	85.00%	25.02	3.75
Hammer Mill and Debarker				141.71	
<b>Total</b>				<b>189.73</b>	<b>7.21</b>

**Methodology**

$(\text{gr/ascf}) \times (\text{acfm}) \times (60 \text{ min/hr}) / (7000 \text{ gr/lb}) = \text{lbs/hr}$   
 $(\text{lbs/hr}) \times (8760 \text{ hr/yr}) / (\text{ton}/2000 \text{ lbs}) = \text{tons/yr annual controlled emissions}$

$(\text{lbs/hr}) / (1-0.85) = \text{lbs/hr}$   
 $(\text{lbs/hr}) \times (8760 \text{ hrs/yr}) / (\text{tons}/2000 \text{ lbs}) = \text{tons/yr annual uncontrolled emissions}$

All woodworking facilities are limited by 326 IAC 6-3-2 at 34 lb/hr, which is equivalent to 148.92 tons/yr.

**Uncontrolled Units**

Uncontrolled emissions are assumed to be  $148.92 - 7.21 = 141.71$