



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: February 13, 2007
RE: Robinson Lumber Company / 043-23342-000060
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06



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NEW SOURCE CONSTRUCTION AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Robinson Lumber Company
1750 Ormond Drive
New Albany, Indiana 47150**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M043-23342-00060	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: February 13, 2007 Expiration Date: February 13, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary lumber processing plant.

Authorized Individual:	General Manager
Source Address:	1750 Ormond Drive, New Albany, Indiana 47150
Mailing Address:	1750 Ormond Drive, New Albany, Indiana 47150
General Source Phone Number:	812-944-8020
SIC Code:	5211
County Location:	Floyd
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired boiler, constructed in 1991, with a maximum heat input capacity of 6.69 MMBtu per hour. This boiler is used as a back-up for the wood-fired boiler.
- (b) Five (5) kilns used for drying lumber, constructed in 1991, with a total maximum throughput capacity of 250,000 board feet per batch with a drying time of thirty (30) days per batch, and with no control devices. One board foot is one (1) foot in length, one (1) foot in width, and one (1) inch thick.
- (c) One (1) wood grinding operation, constructed in 1995, with a maximum throughput capacity of 0.25 tons of wood per hour, with particulate emissions controlled by a cyclone.
- (d) Woodworking operations including the following:
 - (1) One (1) double end trim saw with a maximum throughput capacity of 875 board feet per hour, and no control device.
 - (2) Woodworking operations occurring after wood is dried in the kilns, with a total maximum throughput capacity of 87 cubic feet per hour, and particulate emissions controlled by a cyclone.
- (e) One (1) wood-fired boiler, approved for construction in 2006, with a maximum heat input capacity of 7.16 MMBtu/hr.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M043-23342-00060, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability

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.7 Severability

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.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Certification

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

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) upon startup, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M043-23342-00060 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days 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 2-6.1 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.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.17 Source Modification Requirement

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

B.18 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.21 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11]

- (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 or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas-fired boiler, constructed in 1991, with a maximum heat input capacity of 6.69 MMBtu per hour. This boiler is used as a back-up for the wood-fired boiler.
- (e) One (1) wood-fired boiler, approved for construction in 2006, with a maximum heat input capacity of 7.16 MMBtu/hr.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Emissions [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4(a), the PM emissions from the natural gas-fired boiler shall be limited to 0.6 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4(a), the PM emissions from the wood-fired boiler shall be limited to 0.55 pounds per MMBtu heat input.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the wood-fired boiler.

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

D.1.3 Visible Emissions Notations

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements

To document compliance with Condition D.1.3, the Permittee shall maintain records of daily visible emission notations of the wood-fired boiler stack exhaust. All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) wood grinding operation, constructed in 1995, with a maximum throughput capacity of 0.25 tons of wood per hour, with particulate emissions controlled by a cyclone.
- (d) Woodworking operations including the following:
 - (1) One (1) double end trim saw with a maximum throughput capacity of 875 board feet per hour and no control device.
 - (2) Woodworking operations occurring after wood is dried in the kilns, with a total maximum throughput capacity of 87 cubic feet per hour, and particulate emissions controlled by a cyclone.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Particulate Emissions [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking and grinding operations shall be limited as shown in the following table:

Process	Process Weight (tons/hour)	Emission Limit (pounds/hour)
Grinding	0.25	1.62
Double End Trim Saw	1.67	5.78
Final Woodworking	0.67	3.14

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

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

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

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1, the cyclones for particulate control shall be in operation and control emissions from the grinding and final woodworking facilities at all times that the facilities are in operation.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Robinson Lumber Company
Address:	1750 Ormond Drive
City:	New Albany, Indiana 47150
Phone #:	812-944-8020
MSOP #:	M043-23342-00060

I hereby certify that Robinson Lumber Company is :

still in operation.

no longer in operation.

I hereby certify that Robinson Lumber Company is :

in compliance with the requirements of MSOP M043-23342-00060.

not in compliance with the requirements of MSOP M043-23342-00060.

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

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Robinson Lumber Company
1750 Ormond Drive
New Albany, Indiana 47150

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Robinson Lumber Company, 1750 Ormond Drive, New Albany, Indiana, 47150, completed construction of the wood-fired boiler on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on July 11, 2006 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M043-23342-00060, Plant ID No. 043-00060 issued on _____.
5. Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

My Commission expires:

Signature _____

Name (typed or printed)

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

Technical Support Document (TSD) for a New Source Construction and Minor Source
Operating Permit

Source Background and Description

Source Name:	Robinson Lumber Company
Source Location:	1750 Ormond Drive, New Albany, Indiana 47150
County:	Floyd
SIC Code:	5211
Operation Permit No.:	M043-23342-00060
Permit Reviewer:	ERG/SE

The Office of Air Quality (OAQ) has reviewed an application from Robinson Lumber Company relating to the construction and operation of a stationary lumber processing plant for hardwood flooring.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) natural gas-fired boiler, constructed in 1991, with a maximum heat input capacity of 6.69 MMBtu per hour.
- (b) Five (5) kilns used for drying lumber, constructed in 1991, with a total maximum throughput capacity of 250,000 board feet per batch with a drying time of thirty (30) days per batch, and with no control devices. One board foot is one (1) foot in length, one (1) foot in width, and one (1) inch thick.
- (c) One (1) wood grinding operation, constructed in 1995, with a maximum throughput capacity of 0.25 tons of wood per hour, with particulate emissions controlled by a cyclone.
- (d) Woodworking operations including the following:
 - (1) One (1) double end trim saw with a maximum throughput capacity of 72.9 cubic feet per hour and no control device.
 - (2) Woodworking operations occurring after wood is dried in the kilns, with a total maximum throughput capacity of 87 cubic feet per hour, and particulate emissions controlled by a cyclone. These woodworking operations only occur after wood has been dried in the kilns; therefore the throughput is limited by the kilns.

New Emission Units and Pollution Control Equipment

The application includes information relating to the prior approval for the construction and operation of the following equipment:

- (e) One (1) wood-fired boiler, approved for construction in 2006, with a maximum heat input capacity of 7.16 MMBtu/hr.

Note: This wood-fired boiler will replace the existing natural gas-fired boiler listed as (a) above. The source plans to keep the natural gas-fired boiler as a back-up boiler. Therefore, both boilers are included in this permit.

Existing Approvals

This is the first air approval issued to this source.

Enforcement Issue

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

Recommendation

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

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

An application for the purposes of this review was received on July 11, 2006, with additional information received on September 22, 2006, October 20, 2006, and November 10, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	55.1
PM-10	54.6
SO ₂	0.80
VOC	1.11
CO	21.2
NO _x	18.2

HAPs	Potential to Emit (tons/yr)
Hydrochloric Acid	0.60
Formaldehyde	0.14
Benzene	0.13
Other Trace HAPs	0.29

HAPs	Potential to Emit (tons/yr)
Total	1.16

Note: The potential emissions shown above represent the potential to emit of the source when using both boilers.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all pollutants are less than 100 tons per year, and the potential to emit PM and PM10 is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).

County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM-10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

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

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Floyd County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability - Entire Source section.
- (b) 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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset. See the State Rule Applicability - Entire Source section.
- (c) Floyd County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	55.1
PM-10	54.6
SO ₂	0.80
VOC	1.11
CO	21.2
NO _x	18.2
Single HAP	0.60
Combination HAPs	1.16

- (a) This source is not a major stationary source under PSD because no regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This source is not a major stationary source under Emission Offset because PM10 (used as a surrogate for PM2.5), NO_x, and VOC are not emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Plywood and Composite Wood Products (40 CFR Part 63, Subpart DDDD) are not included in this permit for this source, because this source is not a major source of HAPs and does not manufacture plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) are not included in this permit for this source, because this source is not a major source of HAPs.
- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit.

This MSOP does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any criteria pollutant:

- (1) with the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutant,
- (2) that is subject to an emission limitation or standard for any criteria pollutant, and
- (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)

This source was initially constructed in 1991 in Floyd County, was modified in 1995 and 2006, and is not in 1 of 28 source categories. Floyd County has been designated as non-attainment for PM_{2.5} and for the 8-hour Ozone standard. The potential to emit of all criteria pollutants when the source was initially constructed was less than 100 tons per year. After each modification, the potential to emit of all criteria pollutants remained less than 100 tons per year. Therefore the requirements of 326 IAC 2-2 and 326 IAC 2-3 do not apply.

326 IAC 2-4.1 (New Source Toxics Control)

This source is not a major source of HAPs; therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not a source of fugitive particulate matter emissions. Therefore, the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability – Wood-fired and Natural-Gas Fired Boilers

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

- (a) Pursuant to 326 IAC 6-2-1(d), the natural gas-fired boiler is subject to the requirements of 326 IAC 6-2-4 because it was constructed in Floyd County after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), particulate emissions from this boiler must be calculated using the following equation:

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

Where:

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
Q = total source operating capacity (1 boiler with a heat input of 6.69 MMBtu/hour)

$$Pt = \frac{1.09}{(6.69)^{0.26}}$$

$$Pt = 0.66 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the natural gas-fired boiler must comply with a PM limit of 0.6 lb per MMBtu heat input.

- (b) Pursuant to 326 IAC 6-2-1(d), the wood-fired boiler is subject to the requirements of 326 IAC 6-2-4 because it will be constructed in Floyd County after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), particulate emissions from this boiler must be calculated using the following equation:

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

Where:

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
Q = total source operating capacity (2 boilers with heat inputs of 6.69 and 7.16 MMBtu/hour)

$$Pt = \frac{1.09}{(6.69+7.16)^{0.26}}$$

$$Pt = 0.55 \text{ lb/MMBtu}$$

The wood-fired boiler must comply with a PM limit of 0.55 lb per MMBtu heat input.

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

Pursuant to 326 IAC 6-3-1(b)(1), the boilers are not subject to the requirements of 326 IAC 6-3 because they are a source of indirect heating.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The boilers are not subject to the requirements of 326 IAC 7-1.1, because they do not have a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The boilers do not have the potential to emit twenty-five (25) tons or more per year of VOC. Therefore, the boilers are not subject to the requirements of 326 IAC 8-1-6.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source was in existence prior to the effective date of this rule and does not have the potential to emit 100 tons or more per year of NOx from the entire source. The wood-fired boiler will be constructed after the effective date of this rule and there is no new source performance standard (NSPS) that applies. However, construction of the wood-fired boiler, if it were the only facility at this source, would not require a permit under 326 IAC 2. Therefore, the requirements of 326 IAC 10-1 are not applicable.

State Rule Applicability - Kilns

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

The kilns are not subject to the requirements of 326 IAC 6-2, because they are not a source of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the kilns are not subject to the requirements of 326 IAC 6-3 because they have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The kilns do not have the potential to emit twenty-five (25) tons or more per year of VOC. Therefore, the kilns are not subject to the requirements of 326 IAC 8-1-6.

State Rule Applicability - Grinding and Woodworking

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

- (a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the grinding operation shall be less than 1.62 pounds per hour when operating at a process weight rate of 0.25 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 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 source will comply with this rule by using the cyclone at all times the grinding facility is in operation.

- (b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the double end trim saw operation shall be less than 5.78 pounds per hour when operating at a process weight rate of 1.67 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

- (c) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the final woodworking operations (conducted after wood is dried in kilns) shall be less than 3.14 pounds per hour when operating at a process weight rate of 0.67 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 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 source will comply with this rule by using the cyclone at all times the final woodworking facilities are in operation.

Conclusion

The construction and operation of this stationary lumber processing plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit M043-23342-00060.

**Appendix A: Emission Calculations
Kilns (5)**

Company Name: Robinson Lumber Co.
Address: 1750 Ormond Drive, New Albany, Indiana 47150
MSOP: 043-23342-00060
Reviewer: ERG/SE
Date: November 15, 2006

Maximum Throughput per Batch (board-feet)

250,000

Throughput per Batch (MSF)

250

**Batches per Year

12.2

	*PM	*PM10	***VOC
Emission Factor (lbs/MSF 3/8)	0.18	0.18	0.28
Potential to Emit (tons/yr)	0.27	0.27	0.42

One board-foot is 1 foot long x 1 foot wide x 1 inch thick

*Assume PM equals PM10

**Assumes a drying time of 30 days per batch (12.2 batches per year).

***VOC emission factor is sum of heated zones and cooling section.

Emission factors are from AP42, Chapter 10.9, Tables 10.9-1 and 10.9-3 (SCC 3-07-016-02) [11/2002].

Emission factors are in lbs of pollutant per thousand square feet (MSF) of material that is 3/8 inch thick.

Emission factors are for Laminated Veneer Lumber (LVL) drying and are used as an estimate for the lumber dried in the five kilns at this source.

The maximum throughput per batch in board-feet is provided by the source and is the total maximum throughput for all five kilns.

Methodology

Throughput per Batch (MSF) = Throughput per Batch (board-feet) x 1 MSF/1,000 square feet

Potential to Emit (tons/yr) = Approximate Throughput per Batch (MSF) x Emission Factor (lb/MSF 3/8) x Batches per Year x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Wood-fired Boiler (Dry Wood)**

Company Name: Robinson Lumber Co.
 Address: 1750 Ormond Drive, New Albany, Indiana 47150
 MSOP: 043-23342-00060
 Reviewer: ERG/SE
 Date: November 15, 2006

Heat Input Capacity
(MMBtu/hr)

7.16

	Pollutant					
	PM*	PM10*	SO ₂	NOx	VOC	CO
Emission Factor (lb/MMBtu)	0.40	0.36	0.025	0.49	0.017	0.6
Potential to Emit (tons/yr)	12.5	11.3	0.78	15.4	0.53	18.8

*PM emission factor is for filterable PM. PM10 emission factor is for filterable PM10.

Emission factors are from AP42, Chapter 1.6, Tables 1.6-1 though 1.6-3 for uncontrolled dry wood combustion (9/03)

Methodology

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

**Appendix A: Emission Calculations
Wood-fired Boiler (Dry Wood)**

Company Name: Robinson Lumber Co.
Address: 1750 Ormond Drive, New Albany, Indiana 47150
MSOP: 043-23342-00060
Reviewer: ERG/SE
Date: November 15, 2006

Heat Input Capacity
(MMBtu/hr)

7.16

Organic HAPs

	Hydrogen Chloride	Formaldehyde	Benzene	Acrolein	Styrene
Emission Factor (lb/MMBtu)	1.90E-02	4.40E-03	4.20E-03	4.00E-03	1.90E-03
Potential to Emit (tons/yr)	0.60	0.14	0.13	0.13	0.06

Trace HAPs

	Manganese	Lead	Nickel	Phosphorus	Arsenic
Emission Factor (lb/MMBtu)	1.60E-03	4.80E-05	3.30E-05	2.70E-05	2.20E-05
Potential to Emit (tons/yr)	0.05	1.51E-03	1.03E-03	8.47E-04	6.90E-04

Emission factors are from AP42, Chapter 1.6, Tables 1.6-3 and 1.6-4 [9/03]
The emission factors for the top five organic HAP and Trace Element HAPs are shown above.
Additional emission factors are available in AP42, Chapter 1.6, Tables 1.6-3 and 1.6-4 [9/03]

Methodology

Potential to Emit (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8,760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Existing Natural Gas-fired Boiler**

Company Name: Robinson Lumber Co.
Address: 1750 Ormond Drive, New Albany, Indiana 47150
MSOP: 043-23342-00060
Reviewer: ERG/SE
Date: November 15, 2006

Heat Input Capacity
MMBtu/hr

6.69

Potential Throughput
MMSCF/yr

57.5

Emission Factor (lb/MMSCF)	Pollutant						
	PM*	PM10*	SO ₂	**NOx	VOC	CO	HAPs
Potential to Emit (tons/yr)	1.9	7.6	0.6	100	5.5	84.0	1.89
	0.05	0.22	0.02	2.87	0.16	2.41	0.05

*PM emission factor is for filterable PM. PM10 emission factor is for filterable and condensable PM combined.

**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMSCF= 1,000,000 Standard Cubic Feet of Gas

Emission factors are from AP42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP42 Supplement D 7/98)

Methodology

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

Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Grinding**

Company Name: Robinson Lumber Co.
Address: 1750 Ormond Drive, New Albany, Indiana 47150
MSOP: 043-23342-00060
Reviewer: ERG/SE
Date: November 15, 2006

	Maximum Throughput Capacity (tons/hr)	*Maximum Throughput Capacity (board-feet/hr)	**Maximum Throughput Capacity (sqft 1/8 per hr)	***Particulate Emission Factor (lb/1,000 sqft 1/8)	***Control Efficiency	***Uncontrolled/ Unlimited PTE Particulate (tons/yr)
Grinding Operations	0.25	130	1,042	0.03	99.0%	13.7

Emission factor is from AP-42, Chapter 10.6.4, Table 10.6.4-7 for Hardboard Sander (SCC 3-07-014-80) [9/02].

This emission factor is used as a worst case scenario for the grinding operations, as sanding hardboard is expected to have higher PM/PM10 emissions than the grinding operations at this source.

The maximum throughput capacity in tons/hr was provided by the source in NOD response #1.

*The maximum throughput capacity in board-feet/hr was calculated based on 240 tons/125,000 board-feet, which was provided by the source in NOD response #1.

** One board-foot is 1 ft wide x 1 ft long x 1 in thick. The AP-42 emission factor units are pounds per thousand square feet of 1/8 inch thick material.

In order to use the AP-42 emission factor, the maximum throughput capacity in board-feet/hr was converted to square feet of material 1/8 inch thick per hour using a worst case assumption of 1 board-foot = 8 square feet of 1/8 inch thick material.

***The particulate emission factor from AP-42 assumes a fabric filter is used. In order to calculate uncontrolled potential emissions, a control efficiency of 99% is assumed for a fabric filter.

Methodology

PTE Particulate (tons/yr) = Max Throughput Capacity (sqft 1/8 per hr) * Emission Factor (lb/1,000 sqft 1/8) * 8760 hrs/yr * 1 ton/2000 lbs * 1/(1-Control Efficiency %)

**Appendix A: Emission Calculations
Woodworking**

Company Name: Robinson Lumber Co.
 Address: 1750 Ormond Drive, New Albany, Indiana 47150
 MSOP: 043-23342-00060
 Reviewer: ERG/SE
 Date: November 15, 2006

Limited Throughput for Processes After Kilns

254,167 cuft/yr

Equipment	Control	Maximum Throughput Rate (cuft/day)	**Bottlenecked Throughput Rate (cuft/day)	Particulate Emission Factor (lb/1,000 cuft)	*Controlled Particulate Emissions (tons/yr)	Bottlenecked Uncontrolled PTE Particulate (tons/yr)
Double end trim saw	None	1,750	1,750	0.64	0.20	20.4
Straight line rip saw	Cyclone	1,250	116	0.64	0.15	1.36
Rip saw (24")	Cyclone	1,250	116	0.64	0.15	1.36
Chop saw (3 total)	Cyclone	3,749	348	0.64	0.44	4.07
Planar	Cyclone	1,250	116	0.64	0.15	1.36
	Subtotals (excluding double end trim saw)	7,497	696	Total (including double end trim saw)	1.08	28.6

The maximum throughput rate is based on 24 hrs/day.

Emission factors are from AP42, Chapter 10.9, Table 10.9-7 (11/02) for laminated strand lumber (LSL) saw using a fabric filter for particulate control

Assume PM=PM10. Emission factor provided above is condensable and filterable particulate combined.

The source considers LSL sawing to be similar to their woodworking processes because LSL is made up of various woods, including hardwoods, which is the type of wood processed at Robinson Lumber.

A control efficiency of 99% is assumed for a fabric filter. A 99% control efficiency is used to calculate the Uncontrolled PTE above.

*Controlled particulate emissions are calculated based on a 99% control efficiency assumed for a fabric filter. The control efficiency of the cyclone may be less than 99%.

**The Bottlenecked Throughput Rate (cuft/day) is based on the maximum cuft/yr that can be processed in the kilns. The woodworking operations, excluding the double end trim saw, are conducted after the wood has been dried in the kilns; therefore, the kilns are a bottleneck for the woodworking operations.

Methodology

Controlled Particulate Emissions (tons/yr) = Maximum Throughput Rate (cuft/day) x Emission Factor (lb/1,000 cuft) x 365 days/yr x 1 ton/2000 lbs

Unlimited/Uncontrolled PTE Particulate (tons/yr) = Controlled Particulate Emissions (tons/yr) x 1/(1-99% Control Efficiency)

Limited PTE Particulate (tons/yr) = Limited Throughput Rate (cuft/day) x Particulate Emission Factor (lb/1,000 cuft) x 365 days/yr x 1 ton/2000 lbs x 1/(1-99% Control Efficiency)

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Robinson Lumber Co.
Address: 1750 Ormond Drive, New Albany, Indiana 47150
MSOP: 043-23342-00060
Reviewer: ERG/SE
Date: November 15, 2006

	PM	PM10	SO ₂	NOx	VOC	CO	HAPs
Kilns	0.27	0.27	--	--	0.42	--	--
Wood-fired Boiler	12.5	11.3	0.78	15.4	0.53	18.8	1.10
Natural Gas Fired Boiler	0.05	0.22	0.02	2.87	0.16	2.41	0.05
Grinding	13.7	13.7	--	--	--	--	--
Woodworking	28.6	28.6	--	--	--	--	--
Total using Nat Gas Boiler	42.6	42.8	0.02	2.87	0.58	2.41	1.16
Total using Wood-fired Boiler	55.1	53.8	0.78	15.4	0.95	18.8	1.10

Note: The source is currently using the natural gas-fired boiler, but has applied for a permit to construct and operate the wood-fired boiler.