



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: May 23, 2007  
RE: Hoosier Veneer, LLC / 081-24139-00060  
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 Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Hoosier Veneer, LLC  
718 Park Street  
Trafalgar, Indiana 46181**

(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.

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 an MSOP under 326 IAC 2-6.1.

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.

Operation Permit No.: MSOP 081-24139-00060	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 23, 2007  Expiration Date: May 23, 2012

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY</b> .....	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b> .....	5
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3	Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4	Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.5	Term of Conditions [326 IAC 2-1.1-9.5]	
B.6	Enforceability	
B.7	Severability	
B.8	Property Rights or Exclusive Privilege	
B.9	Duty to Provide Information	
B.10	Certification	
B.11	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.15	Permit Renewal [326 IAC 2-6.1-7]	
B.16	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
B.17	Source Modification Requirement	
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] [IC13-17-3-2] [IC 13-30-3-1]	
B.19	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.20	Annual Fee Payment [326 IAC 2-1.1-7]	
B.21	Credible Evidence [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	10
	<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.9	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.11	Compliance Monitoring [326 IAC 2-1.1-11]	
C.12	Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.13	Instrument Specifications [326 IAC 2-1.1-11]	

**Corrective Actions and Response Steps**

- C.14 Response to Excursions or Exceedances
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- C.16 Malfunctions Report [326 IAC 1-6-2]
- C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

**D.1 EMISSIONS UNIT OPERATION CONDITIONS: Hardwood Veneer Manufacturing..... 16**

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

- D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-2]
- D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

- D.1.4 Visible Emissions Notations

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

- D.1.5 Record Keeping Requirements

**New Source Performance Standards (NSPS) Requirements**

- D.1.6 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.1.7 Small Industrial-Commercial-Institutional Steam Generating Units Requirements [40 CFR Part 60, Subpart Dc] [326 IAC 12]
- D.1.8 State Only Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [326 IAC 12]
- D.1.9 One Time Deadlines Relating to NSPS Dc

**Certification ..... 22**

**Annual Notification ..... 23**

**Malfunction Report..... 24**

**Affidavit of Construction ..... 26**

## 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)]

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The Permittee owns and operates a hardwood veneer manufacturing source.

Source Address:	718 Park Street, Trafalgar, Indiana 46181
Mailing Address:	718 Park Street, Trafalgar, Indiana 46181
General Source Phone Number:	317 - 878 - 4887
SIC Code:	2435
County Location:	Johnson
Source Location Status:	Nonattainment for PM <sub>2.5</sub> and 8-hour ozone 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

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

- (a) Sawmill operations, constructed prior to 1990, uncontrolled and exhausting inside the building, consisting of the following:
  - (1) One (1) debarking operation, capacity: 3,071 board feet per 8-hour shift (0.878 tons of logs per hour).
  - (2) One (1) sawing operation, capacity: 2,870 board feet per 8-hour shift (0.821 tons of logs per hour).
- (b) One wood hog, used to chip scrap wood, capacity: 230 board feet per 8-hour shift (0.066 tons of wood per hour).
- (c) One (1) natural gas-fired boiler, identified as B-1, constructed in 1964, exhausting to Stack B-1, rated at 14 million British thermal units per hour.
- (d) One (1) wood-fired boiler, identified as WB-1, using natural gas as back-up fuel, equipped with a multicyclone for particulate control and exhausting to Stack WB-1, rated at 19.12 million British thermal units per hour.

## **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, MSOP 081-24139-00060, 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**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

**B.10 Certification**

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

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

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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 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]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this

permit, including the following information on each 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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]**

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- (a) All terms and conditions of permits established prior to MSOP 081-24139-00060 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)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 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]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. 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  
MC 61-53 IGCN 1003  
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]**

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- (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  
MC 61-53 IGCN 1003  
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**

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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] [IC13-17-3-2] [IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a 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  
MC 61-53 IGCN 1003  
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  
MC 61-52 IGCN 1003  
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]**

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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(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 instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

## **Corrective Actions and Response Steps**

### **C.14 Response to Excursions or Exceedances**

- (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**

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- (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 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.16 Malfunctions Report [326 IAC 1-6-2]**

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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.17 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.18 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  
MC 61-53 IGCN 1003  
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: Hardwood Veneer Manufacturing

- (a) Sawmill operations, constructed prior to 1990, uncontrolled and exhausting inside the building, consisting of the following:
  - (1) One (1) debarking operation, capacity: 3,071 board feet per 8-hour shift (0.878 tons of logs per hour).
  - (2) One (1) sawing operation, capacity: 2,870 board feet per 8-hour shift (0.821 tons of logs per hour).
- (b) One wood hog, used to chip scrap wood, capacity: 230 board feet per 8-hour shift (0.066 tons of wood per hour).
- (c) One (1) natural gas-fired boiler, identified as B-1, constructed in 1964, exhausting to Stack B-1, rated at 14 million British thermal units per hour.
- (d) One (1) wood-fired boiler, identified as WB-1, using natural gas as back-up fuel, equipped with a multicyclone for particulate control and exhausting to Stack WB-1, rated at 19.12 million British thermal units per hour.

(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 Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(b)), the particulate emissions from the one (1) natural gas-fired boiler (B-1), shall not exceed 0.57 pounds per million British thermal units heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = 0.87/Q^{0.16}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For this unit, Q = 14.0 MMBtu/hr.

#### D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the particulate emissions from the one (1) wood-fired boiler (WB-1), shall not exceed 0.439 pounds per million British thermal units heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For this unit, Q = 33.12 MMBtu/hr.

#### D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) wood-fired boiler (WB-1).

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

#### D.1.4 Visible Emissions Notations

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- (a) Visible emission notations of the one (1) wood-fired boiler stack exhaust (Stack WB-1) shall be performed once per day during normal daylight operations when combusting wood. 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.1.5 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain a daily record of visible emission notations of the one (1) wood-fired boiler stack exhaust (Stack WB-1). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## **New Source Performance Standards (NSPS) Requirements**

### **D.1.6 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the wood-fired boiler (WB-1) except as otherwise specified in 40 CFR Part 60, Subpart Dc.

(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue,  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

### **D.1.7 Small Industrial-Commercial-Institutional Steam Generating Units Requirements [40 CFR Part 60, Subpart Dc] [326 IAC 12]**

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, which are incorporated by reference as 326 IAC 12 for the wood-fired boiler (WB-1) as specified as follows:

#### **§ 60.40c Applicability and delegation of authority.**

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 71 FR 9884, Feb. 27, 2006]

#### **§ 60.41c Definitions.**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

*Annual capacity factor* means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

*Coal* means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388–77, 90, 91, 95, or 98a, Standard Specification for Classification of Coals by Rank (IBR—see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

*Coal refuse* means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

*Cogeneration steam generating unit* means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

*Combined cycle system* means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

*Combustion research* means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (i.e., the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

*Conventional technology* means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

*Distillate oil* means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

*Dry flue gas desulfurization technology* means a sulfur dioxide (SO<sub>2</sub>) control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

*Duct burner* means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

*Emerging technology* means any SO<sub>2</sub> control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

*Federally enforceable* means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR Parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

*Fluidized bed combustion technology* means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

*Fuel pretreatment* means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

*Heat input* means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

*Heat transfer medium* means any material that is used to transfer heat from one point to another point.

*Maximum design heat input capacity* means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

*Natural gas* means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835–86, 87, 91, or 97, "Standard Specification for Liquefied Petroleum Gases" (incorporated by reference—see §60.17).

*Noncontinental area* means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

*Oil* means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

*Potential sulfur dioxide emission rate* means the theoretical SO<sub>2</sub> emissions (nanograms per joule [ng/J], or pounds per million Btu [lb/million Btu] heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

*Process heater* means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

*Residual oil* means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils" (incorporated by reference—see §60.17).

*Steam generating unit* means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

*Steam generating unit operating day* means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

*Wet flue gas desulfurization technology* means an SO<sub>2</sub> control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

*Wet scrubber system* means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of particulate matter (PM) or SO<sub>2</sub>.

*Wood* means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

#### **§ 60.48c Reporting and recordkeeping requirements.**

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(g) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999; 65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006]

D.1.8 State Only Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [326 IAC 12]

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Pursuant to 326 IAC 12, for the one (1) boiler (WB-1), the Permittee shall record and maintain records of the amounts of each fuel combusted during each day.

D.1.9 One Time Deadlines Relating to NSPS Dc

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The Permittee shall comply with the following requirements by the dates listed:

Requirement	Rule Cite	Affected Facility	Deadline
Submit initial notification including date of anticipated startup	40 CFR 60.48c(a)	WB-1	Postmarked no later than 30 days after construction
Submit notification of actual startup	40 CFR 60.48c(a)	WB-1	Postmarked within 15 days after startup

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

**MINOR SOURCE OPERATING PERMIT  
CERTIFICATION**

Source Name: Hoosier Veneer, LLC  
Source Address: 718 Park Street, Trafalgar, Indiana 46181  
Mailing Address: 718 Park Street, Trafalgar, Indiana 46181  
Permit No.: MSOP 081-24139-00060

**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**

**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).

<b>Source Name:</b>	<b>Hoosier Veneer, LLC</b>
<b>Address:</b>	<b>718 Park Street</b>
<b>City:</b>	<b>Trafalgar, Indiana 46181</b>
<b>Phone #:</b>	<b>317 - 878 - 4887</b>
<b>MSOP #:</b>	<b>081-24139-00060</b>

I hereby certify that Hoosier Veneer, LLC is

- still in operation.
- no longer in operation.

I hereby certify that Hoosier Veneer, LLC is

- in compliance with the requirements of MSOP 081-24139-00060.
- not in compliance with the requirements of MSOP 081-24139-00060.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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 PERMIT 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:

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Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Hoosier Veneer, LLC  
718 Park Street  
Trafalgar, Indiana 46181

**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 knowledge of the  
(Company Name)  
representations contained in this affidavit and am authorized to make these representations on behalf of  
\_\_\_\_\_.  
(Company Name)

4. I hereby certify that Hoosier Veneer, LLC, 718 Park Street, Trafalgar, Indiana 46181, completed construction of the wood-fired boiler (WB-1) on \_\_\_\_\_ in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Quality on January 2, 2007 and as permitted pursuant to **MSOP No. 081-24139, Plant ID No. 081-00060** issued on \_\_\_\_\_.

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

### Addendum to the Technical Support Document for a Minor Source Operating Permit

<b>Source Name:</b>	<b>Hoosier Veneer, LLC</b>
<b>Source Location:</b>	<b>718 Park Street, Trafalgar, Indiana 46181</b>
<b>County:</b>	<b>Johnson</b>
<b>Construction Permit No.:</b>	<b>MSOP 081-24139-00060</b>
<b>SIC Code:</b>	<b>2435</b>
<b>Permit Reviewer:</b>	<b>Edward A. Longenberger</b>

On April 6, 2007, the Office of Air Quality (OAQ) had a notice published in the Daily Journal, Franklin, Indiana, stating that Hoosier Veneer, LLC had applied for an operating permit to operate a hardwood veneer manufacturing source. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the operating permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### Change 1:

IDEM, OAQ has added mail codes to the addresses listed in the permit for the following: Permit Branch; Compliance Branch; Compliance Data Section; Technical Support and Modeling; and Asbestos Section.

#### Change 2:

The following changes to Conditions D.1.4 and D.1.5 have been made to clarify the visible emissions notations requirement and the associated record keeping requirements:

##### D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the one (1) wood-fired boiler stack exhaust (Stack WB-1) shall be performed once per day during normal daylight operations when combusting wood ~~and exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

##### D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain **a daily record** ~~records of daily~~ visible emission notations of the one (1) wood-fired boiler stack exhaust (Stack WB-1). **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Hoosier Veneer, LLC</b>
<b>Source Location:</b>	<b>718 Park Street, Trafalgar, Indiana 46181</b>
<b>County:</b>	<b>Johnson</b>
<b>SIC Code:</b>	<b>2435</b>
<b>Operation Permit No.:</b>	<b>MSOP 081-24139-00060</b>
<b>Permit Reviewer:</b>	<b>Edward A. Longenberger</b>

The Office of Air Quality (OAQ) has reviewed an application from Hoosier Veneer, LLC relating to the construction and operation of a hardwood veneer manufacturing source.

**History**

This existing hardwood veneer manufacturing source, previously known as Besse Veneers, was purchased by Hoosier Veneer in June 2006. The source was operating at exemption levels. Hoosier Veneer intends to install a wood-fired boiler at this existing plant. The installation of this wood-fired boiler will increase the potential to emit of this source such that an MSOP will be required.

In addition to the equipment listed below, this source also includes miscellaneous veneer operations, including flitch vats, planing, veneer slicing, drying and clipping. These operations are not expected to produce emissions. The veneer operations are performed with wood logs which have been soaked in warm water in the vats, and thus do not produce sawdust or particulate matter emissions. The clipping operations use a knife blade to square-off the veneer, and the wood waste from this process consists of strips of veneer, not sawdust. The veneer dryers use heat from the boilers to dry the veneer, so any emissions from this process are accounted for in the boiler calculations.

**Permitted Emission Units and Pollution Control Equipment**

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

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted emission units:

- (a) Sawmill operations, constructed prior to 1990, uncontrolled and exhausting inside the building, consisting of the following:
  - (1) One (1) debarking operation, capacity: 3,071 board feet per 8-hour shift (0.878 tons of logs per hour).
  - (2) One (1) sawing operation, capacity: 2,870 board feet per 8-hour shift (0.821 tons of logs per hour).
- (b) One wood hog, used to chip scrap wood, capacity: 230 board feet per 8-hour shift (0.066 tons of wood per hour).

- (c) One (1) natural gas-fired boiler, identified as B-1, constructed in 1964, exhausting to Stack B-1, rated at 14 million British thermal units per hour.

### **New Emission Units and Pollution Control Equipment**

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

One (1) wood-fired boiler, identified as WB-1, using natural gas as back-up fuel, equipped with a multicyclone for particulate control and exhausting to Stack WB-1, rated at 19.12 million British thermal units per hour.

### **Existing Approvals**

The source has no previous IDEM, OAQ approvals.

### **Enforcement Issue**

There are no enforcement actions pending. The existing unpermitted equipment was operated under exemption levels.

### **Stack Summary**

<b>Stack ID</b>	<b>Operation</b>	<b>Height (ft)</b>	<b>Diameter (ft)</b>	<b>Flow Rate (acfm)</b>	<b>Temperature (°F)</b>
WB-1	Wood-Fired Boiler	35.0	2.5	9,328	348

### **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 January 2, 2007, with additional information received on February 9, 2007 and February 26, 2007.

### **Emission Calculations**

See Pages 1 through 5 of Appendix A of this document for detailed emission calculations.

### **Potential to Emit of the Source Before Controls**

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

Pollutant	Potential to Emit (tons/yr)
PM	29.19
PM <sub>10</sub>	26.99
SO <sub>2</sub>	2.13
VOC	1.43
CO	55.40
NO <sub>x</sub>	24.56

HAPs	Potential to Emit (tons/yr)
Acrolein	0.335
Benzene	0.352
Dichlorobenzene	0.00007
Formaldehyde	0.374
Hexane	0.110
Hydrogen Chloride	1.59
Styrene	0.159
Toluene	0.0002
Lead	0.00003
Cadmium	0.00007
Chromium	0.00009
Manganese	0.00002
Nickel	0.00013
Total	2.92

The potential to emit of PM and PM<sub>10</sub> are each greater than twenty-five (25) tons per year but less than one hundred (100) tons per year. The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

**County Attainment Status**

The source is located in Johnson County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Johnson County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment 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 PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability - Entire Source section of this document.
- (c) Johnson County has been classified as attainment or unclassifiable in Indiana for all remaining 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 of this document.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability. Pursuant to 326 IAC 2-7-2(e), all fugitive emissions are counted toward the determination of Part 70 Applicability.

**Source Status**

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	9.84
PM <sub>10</sub>	8.99
SO <sub>2</sub>	2.13
VOC	1.43
CO	55.40
NO <sub>x</sub>	24.56
Single HAP (Hydrogen Chloride)	1.59
Combination HAPs	2.92

- (a) This existing source is not a major stationary source under 326 IAC 2-2 (PSD) because no attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing source is not a major stationary source under 326 IAC 2-3 (Emission Offset) or the nonattainment new source review rules because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.
- (c) These emissions are based on the calculations contained in pages 3 through 5 of Appendix A of this document.

**Proposed Modification**

Potential to emit from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM <sub>10</sub> (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification (Boiler WB-1) Worst case fuel (wood)	8.29	7.71	2.09	1.09	50.25	18.43
PSD, Emission Offset or Nonattainment NSR Threshold Level	250	100	250	100	250	100

Although the one (1) wood-fired boiler uses natural gas as backup fuel, for each pollutant, the worst case emissions result from wood combustion.

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

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

This modification to an existing minor stationary source is not major because the emission increase is less than the nonattainment area new source review major source levels. Therefore, pursuant to 326 IAC 2-1.1-5, the nonattainment area new source review requirements do not apply.

### **Part 70 Permit Determination**

#### **326 IAC 2-7 (Part 70 Permit Program)**

This source, including the emissions from this permit (MSOP 081-24139-00060), is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This is the first air approval issued to this source.

### **Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts D, Da, or Db are not included in the permit for this source because the proposed wood-fired boiler (WB-1) is not an electric utility steam generator, and has a design heat input capacity less than one hundred (100) million British thermal units per hour.
- (b) The requirements of the NSPS, 40 CFR 60, Subpart Dc, are not included in the permit for the existing natural gas-fired boiler (B-1), because the boiler was constructed in 1964, prior to the June 9, 1989 applicability date.
- (c) The proposed wood-fired boiler (WB-1), rated at 19.12 million British thermal units per hour, is an affected facility of the NSPS for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12 and 40 CFR Part 60, Subpart Dc). However, there are no emission limitations or standards for wood-fired boilers with a design heat input capacity less than thirty (30) million British thermal units per hour.

Pursuant to 40 CFR 60.48c:

- (1) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:

The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

- (2) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.

- (3) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two (2) years following the date of such record.
  
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for industrial, commercial, and institutional boilers and process heaters (40 CFR 63, Subpart DDDDD) are not included in the permit since this source is not a major source of HAPs as defined in 40 CFR 63.2.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-1.1-5 (Nonattainment Area New Source Review)**

This source is located in a county that is designated as nonattainment for PM<sub>2.5</sub>. The unrestricted potential particulate emissions are less than one hundred (100) tons per year. Therefore, this source is a minor source under the nonattainment new source review rules.

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

The unrestricted potential emissions of each attainment criteria pollutant are less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

#### **326 IAC 2-3 (Emission Offset)**

The unrestricted potential VOC emissions and the unrestricted potential NO<sub>x</sub> emissions are each less than one hundred (100) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

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

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

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

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

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

### State Rule Applicability – Individual Facilities

#### 326 IAC 2-4.1-1 (New source toxics control)

The operation of this hardwood veneer manufacturing source will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(b))

The one (1) natural gas-fired boiler, identified as B-1, rated at 14.0 million British thermal units per hour, constructed in 1964, must comply with the requirements of 326 IAC 6-2-2, since the boiler was constructed prior to September 21, 1983 and is located in Johnson County. The emission limitation is based on the following equation:

$$Pt = 0.87/Q^{0.16}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Pursuant to 326 IAC 6-2-2(b), the emission limitations for indirect heating facilities which were existing and in operation on or before June 8, 1972, shall be calculated using the above equation where Q shall reflect the total source capacity on June 8, 1972. Since the one (1) boiler (B-1) was constructed prior to June 8, 1972, Q = 14.0 million British thermal units per hour.

$$Pt = 0.87/(14.0)^{0.16} = 0.57 \text{ lb/mmBtu heat input}$$

Based on Appendix A, the potential particulate emission rate from the one (1) boiler (B-1) is:

$$0.466 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.106 \text{ lb/hr}$$
$$(0.106 \text{ lb/hr} / 14.0 \text{ mmBtu/hr}) = 0.008 \text{ lb PM per mmBtu}$$

The particulate emissions from the one (1) boiler (B-1) are 0.008 pounds per million British thermal units, which is less than the allowable of 0.57 pounds per million British thermal units. Therefore, the one (1) boiler (B-1) can comply with this rule.

#### 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d))

The one (1) wood-fired boiler, identified as WB-1, rated at 19.12 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4, since the boiler will be constructed after September 21, 1983. The emission limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The total boiler heat input capacity for the source is 33.12 million British thermal units per hour.

$$Pt = 1.09/(33.12)^{0.26} = 0.439 \text{ lb/mmBtu heat input}$$

Based on Appendix A, the potential particulate emission rate before controls from the one (1) boiler (WB-1) is:

$$27.64 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 6.31 \text{ lb/hr}$$
$$(6.31 \text{ lb/hr} / 19.12 \text{ mmBtu/hr}) = 0.33 \text{ lb PM per mmBtu}$$

The uncontrolled particulate emissions from the one (1) boiler (WB-1) are 0.33 pounds per million British thermal units, which is less than the allowable of 0.439 pounds per million British thermal units. Therefore, the one (1) boiler (WB-1) can comply with this rule, without the use of the multi-cyclone control device.

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

The particulate emissions from the one (1) debarking operation, the one (1) sawing operation, and the wood hog are each less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these facilities are exempt from the requirements of 326 IAC 6-3-2.

The planing, veneer slicing, and clipping operations are not expected to produce particulate emissions, and thus the particulate emissions are each less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these facilities are exempt from the requirements of 326 IAC 6-3-2.

### 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO<sub>2</sub> emissions from this source are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 7-1.1.

### 326 IAC 9-1 (Carbon Monoxide Emission Limits)

This source does not engage in petroleum refining operations, ferrous metal smelting or refuse incineration. Therefore, the source is not subject to the requirements of 326 IAC 9-1.

### 326 IAC 12 (New Source Performance Standards)

Pursuant to 326 IAC 1-1-3, unless otherwise indicated, any reference to a provision of the Code of Federal Regulations (CFR) shall mean the July 1, 2005, edition. 40 CFR 60, Subpart Dc was revised on February 27, 2006. Therefore, 326 IAC 12, references the previous version of 40 CFR 60, Subpart Dc, and this source is subject to both versions of the rule.

The new 40 CFR 60.48c(g) has not been incorporated into the state rules. Therefore, the source must maintain daily records of the fuels combusted by the wood-fired boiler (WB-1).

The wood-fired boiler (WB-1) is required to comply with the requirements of the new version of 40 CFR 60.40c, Subpart Dc, as described in the "Federal Rule Applicability" section of this TSD.

## Compliance Requirements

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

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

The one (1) wood-fired boiler, identified as WB-1 has applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the one (1) wood-fired boiler stack exhaust (Stack WB-1) shall be performed once per day during normal daylight operations when combusting wood and 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.

These monitoring conditions are necessary because the one (1) wood-fired boiler, identified as WB-1, must operate properly to ensure compliance with 326 IAC 6-2-4 (Particulate Emissions

Limitations for Facilities Constructed after September 21, 1983) and 326 IAC 2-6.1 (Minor Source Operating Permits).

### **Conclusion**

The construction and operation of this hardwood veneer manufacturing source shall be subject to the conditions of the New Source Review and Minor Source Operating Permit No. **MSOP 081-24139-00060**.

**Appendix A: Emissions Calculations  
External Combustion Boiler  
Wood Combustion  
Wet Wood**

**Company Name: Hoosier Veneer, LLC  
Address City IN Zip: 718 Park Street, Trafalgar, Indiana 46181  
Permit Number: MSOP 081-24139-00060  
Reviewer: Edward A. Longenberger  
Date: March 22, 2007**

**Boiler WB-1**

Capacity (tons/hr)  
Higher Heating Value of Fuel (Btu/lb)  
Capacity (MMBtu/hr)

1.7705
5,400
19.12

Particulate Control Device: Multicyclone  
Control Efficiency: 70%

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.33	0.307	0.267	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	27.64	25.71	22.36	2.09	18.43	1.09	50.25
Potential Emissions after Control in tons/yr	8.29	7.71	6.71	2.09	18.43	1.09	50.25

**Boiler WB-1**  
(when burning natural gas)

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

19.12
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168

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100	5.50	84.0
Potential Emission in tons/yr	0.159	0.637	0.050	8.38	0.461	7.04

Methodology for natural gas emissions is on page 3.

**Methodology**

\*The PM10 and PM2.5 emission factors include the condensable 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).

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), Tables 1.6-1 and 1.6-2.

To convert from tons/hr capacity to MMBtu/hr capacity:

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

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

Controlled Emissions (tons/yr) = Potential Emissions (tons/yr) x (1 - Control Efficiency)

**Appendix A: HAPs Emissions Calculations  
External Combustion Boiler  
Wood Combustion**

**Company Name: Hoosier Veneer, LLC  
Address City IN Zip: 718 Park Street, Trafalgar, Indiana 46181  
Permit Number: MSOP 081-24139-00060  
Reviewer: Edward A. Longenberger  
Date: March 22, 2007**

**Boiler WB-1**

Capacity (MMBtu/hr)

19.12

Emission Factor in lb/MMBtu	Selected Hazardous Air Pollutants					
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Total HAPs
Potential Emissions in tons/yr	0.004	0.004	0.004	0.019	0.002	2.81
	0.335	0.352	0.369	1.59	0.159	

**Methodology**

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), Tables 1.6-1 and 1.6-2.

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

These factors include the five HAPs with the highest AP-42 emission factors.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler (B-1)**

**Company Name:** Hoosier Veneer, LLC  
**Address City IN Zip:** 718 Park Street, Trafalgar, Indiana 46181  
**Permit Number:** MSOP 081-24139-00060  
**Reviewer:** Edward A. Longenberger  
**Date:** March 22, 2007

**Boiler B-1**  
 Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

14.0

123

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.117	0.466	0.037	6.13	0.337	5.15

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

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler (B-1)  
 HAPs Emissions**

**Company Name: Hoosier Veneer, LLC**  
**Address City IN Zip: 718 Park Street, Trafalgar, Indiana 46181**  
**Permit Number: MSOP 081-24139-00060**  
**Reviewer: Edward A. Longenberger**  
**Date: March 22, 2007**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000129	0.000074	0.004599	0.110376	0.000208

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	<b>Total</b>
Potential Emission in tons/yr	0.00003	0.00007	0.00009	0.00002	0.00013	<b>0.116</b>

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
Sawmill Operations**

**Company Name: Hoosier Veneer, LLC  
Address City IN Zip: 718 Park Street, Trafalgar, Indiana 46181  
Permit Number: MSOP 081-24139-00060  
Reviewer: Edward A. Longenberger  
Date: March 22, 2007**

Process	Throughput (BDFT/8 hr shift)	Throughput (cubic feet/hr)	Density of Wood (lbs/cubic feet)	Throughput (tons/hr)	Particulate Emission Factor (lbs/ton)	PM-10 Emission Factor (lbs/ton)	Particulate Emissions (lbs/hr)	PM-10 Emissions (lbs/hr)	Particulate Emissions (tons/yr)	PM-10 Emissions (tons/yr)
Debarking	3,071	31.99	54.9	0.878	0.02	0.011	0.018	0.010	0.077	0.042
Sawmill	2,870	29.90	54.9	0.821	0.35	0.2	0.287	0.164	1.258	0.719
Wood Hog	230	2.39	54.9	0.066	0.35	0.2	0.023	0.013	0.101	0.058
<b>Total</b>									<b>1.436</b>	<b>0.819</b>

**METHODOLOGY**

1 board foot (BDFT) = 1/12 cubic foot

Throughput (cubic feet/hr) = Throughput (BDFT/8 hr shift) / (12 BDFT / cubic foot) / (8 hrs/shift)

Density of Wood: Assume worst case wood -- white oak with a specific gravity of 0.88 (Wood Handbook, Wood as an Engineering Material, USDA Forest Service) x density of water (62.39 lbs/cu ft)

Throughput (tons/hr) = Throughput (cubic feet/hr) x Density of Wood (lbs/cubic foot) / (1 ton/2000 lbs)

Emission Factors from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Pollutants, March 1990 (SCC 3-07-008-01 and 02)

Emissions (lbs/hr) = Throughput (tons/hr) x Emission Factor (lbs/ton)

Emissions (tons/yr) = Emissions (lbs/hr) x (8,760 hours/year) / (2,000 lbs/ton)