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## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

### Preliminary Findings Regarding a Minor Source Operating Permit

#### for Thiesing Veneer Company, Inc. in Morgan County

**MSOP: 109-24196-00006**

The Indiana Department of Environmental Management (IDEM) has received an application from Thiesing Veneer Company, Inc. located at 300 Park Drive, Mooresville, Indiana 46158, for a Minor Source Operating Permit (MSOP). IDEM's Office of Air Quality (OAQ) issues this type of permit to regulate the operation of new sources, existing sources, and modifications at existing sources that release air pollutants.

IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several associated documents, that would allow Thiesing Veneer Company, Inc. to continue to operate a wood veneer manufacturing source. If this would operate 365 days a year, 24 hours a day, 7 days a week, it could potentially release 71.2 tons of PM, 57.8 tons of PM<sub>10</sub>, 2.17 tons of SO<sub>2</sub>, 19.7 tons of NO<sub>x</sub>, 1.16 tons of VOC, 52.6 tons of CO, 1.65 tons of an individual HAP (Hydrogen Chloride) and 2.92 tons of total HAPs per year. However the MSOP will limit emissions to 69.6 tons of PM per year. The permit requires the use of air pollution control equipment to limit the amount of air pollution that can be released.

A copy of the permit application and IDEM's preliminary findings are available at:

Mooresville Public Library  
220 West Harrison St.  
Mooresville, IN 46158

A copy of the preliminary findings is available on the Internet at: [www.in.gov/idem/permits/air/pending.html](http://www.in.gov/idem/permits/air/pending.html).

### How can you participate in this process?

The day after this announcement is published in a newspaper marks the beginning of a 30-day public comment period. During that 30-day period, you may comment on this draft permit. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM may hold a public hearing. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing. At a hearing, you would have an opportunity to submit written comments, make verbal comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation or a request for a public hearing should be sent in writing to IDEM. If you do not want to comment at this time, but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number MSOP 109-24196-00006 in all correspondence.

**To Contact IDEM:**

IDEM, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-6878

Pursuant to Contract No. A 305-5-66, IDEM, OAQ has assigned the processing of this permit application to Meteorological Evaluation Services Co., Inc. Therefore, questions should be directed to CarrieAnn Paukowits of Meteorological Evaluations Services Co., Inc.

**To Contact the Permit Reviewer:**

CarrieAnn Paukowits  
Meteorological Evaluation Services Co., Inc.  
165 Broadway  
Amityville, New York 11701  
Dial directly: (631) 691-3395, ext. 18

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 North Senate, Indianapolis.

If you have any questions please contact CarrieAnn Paukowits at the above address.

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

For additional information about air permits, and how you can participate, please see IDEM **Citizens' Guide to Public Participation** and **Permit Guide** on the Internet at: [www.in.gov/idem/permits/guide/](http://www.in.gov/idem/permits/guide/).

CAP/MES



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DRAFT

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## Minor Source Operating Permit OFFICE OF AIR QUALITY

**Thiesing Veneer Company, Inc.  
300 Park Drive  
 Mooresville, Indiana 46158**

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

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

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

Operation Permit No.: MSOP 109-24196-00006	
Issued by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

## 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> .....	6
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Certification	
B.9	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13	Permit Renewal [326 IAC 2-6.1-7]	
B.14	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
B.15	Source Modification Requirement	
B.16	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]	
B.17	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18	Annual Fee Payment [326 IAC 2-1.1-7]	
B.19	Credible Evidence [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	11
	<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]	
	<b>Corrective Actions and Response Steps</b>	
C.13	Response to Excursions or Exceedances	
C.14	Actions Related to Noncompliance Demonstrated by a Stack Test	

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

- C.15 Malfunctions Report [326 IAC 1-6-2]
- C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

**Stratospheric Ozone Protection**

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

**D.1 EMISSIONS UNIT OPERATION CONDITIONS: Woodworking..... 17**

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

- D.1.1 Particulate [326 IAC 6-3-2]

**D.2 EMISSIONS UNIT OPERATION CONDITIONS: Boiler ..... 19**

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

- D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

**Compliance Determination Requirements**

- D.2.3 Particulate Control

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

- D.2.4 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.2.5 Record Keeping Requirements

**Certification ..... 21**

**Annual Notification ..... 22**

**Malfunction Report..... 23**

## 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 for MSOP 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 wood veneer manufacturing source.

Source Address:	300 Park Drive, Mooreville, Indiana 46158
Mailing Address:	300 Park Drive, Mooreville, Indiana 46158
General Source Phone Number:	(317) 831-4040
SIC Code:	2435
County Location:	Morgan
Source Location Status:	Nonattainment for Ozone and PM <sub>2.5</sub> 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

### 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) Woodworking operations, consisting of the following:
  - (1) One (1) saw mill, consisting of the following:
    - (A) One (1) debarking process, identified as EU-XIII, constructed in 2004, equipped with a cyclone (Bark Cyclone) and exhausting to Stack A, capacity: 7,513 pounds of logs per hour.
    - (B) One (1) chipper, identified as EU-XIV, constructed in 1987, equipped with a cyclone (Chip Cyclone) and exhausting to Stack E, capacity: 7,513 pounds of logs per hour.
    - (C) Log sawing operations, identified as EU-IX, constructed in 1997, equipped with a cyclone (Sawdust Cyclone) and exhausting to Stack B, capacity: 7,513 pounds of logs per hour.
  - (2) One (1) vat area consisting of a log soaking process with no air emissions.
  - (3) One (1) wet slicing operation, equipped with two (2) slicers, identified as EU-IV and V, constructed in 1964 and 1970, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 2,504 pounds of wet hardwood logs per hour, total.
  - (4) One (1) rotary veneering operation, identified as EU-VI, with no air emissions, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 1,252 pounds of wet hardwood logs per hour.
  - (5) One (1) veneer drying room, with two (2) dryers, identified as EU-II and EU-III, constructed in 1989 and 1991 and exhausting through Stacks 4a and b and 5a and

- b, respectively, using steam heat from the boiler, capacity: 1,800 pounds of hardwood logs per hour, per dryer.
- (6) One (1) veneer clipping line, identified as EU-VII, constructed in 1980, equipped with a cyclone (DryVen Cyclone) and exhausting to Stack D, capacity: 4,734 pounds of hardwood logs per hour.
  - (7) One (1) veneer clipping line, identified as EU-VIII, constructed in 1976, equipped with a cyclone (DryVen Cyclone) and exhausting to Stack D, capacity: 1,800 pounds of hardwood logs per hour.
  - (8) Trim sawing operations, identified as EU-X, constructed in 2004, equipped with a cyclone (Planer Cyclone) and exhausting to Stack F, capacity: 3,757 pounds of logs per hour.
  - (10) Rip sawing operations, identified as EU-XI, constructed in 2004, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 1,252 pounds of logs per hour.
  - (11) Radial arm saws, identified as EU-XII, constructed in 1965, capacity: 69.9 pounds of lumber per hour.
- (b) One (1) wood waste-fired boiler, identified as EU-I, constructed in 1964, equipped with a fly ash collector, obtaining wood waste from a silo with five (5) cyclones, exhausting through Stack 1, input capacity: 19.2 million British thermal units and 1.92 tons of wood waste per hour.
  - (c) One (1) wood waste-fired stove, identified as EU-XV, constructed in 1992, exhausting through Stack 3, input capacity: 0.6 million British thermal units and 0.06 tons of wood waste per hour.
  - (d) One (1) natural gas-fired heater, identified as EU-XVI, constructed in 1958, exhausting through Stack 2, capacity: 1.5 million British thermal units per hour.

## **SECTION B GENERAL CONDITIONS**

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### **B.2 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 109-24196-00006, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability**

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

### **B.5 Severability**

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

### **B.6 Property Rights or Exclusive Privilege**

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

### **B.7 Duty to Provide Information**

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

**B.8 Certification**

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

**B.9 Annual 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.10 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.11 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 109-24196-00006 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.12 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.13 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.14 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.15 Source Modification Requirement**

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

**B.16 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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(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.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(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.19 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(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 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]**

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

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

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

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

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(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

able for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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]**

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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]**

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

**Corrective Actions and Response Steps**

**C.13 Response to Excursions or Exceedances**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (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.14 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.15 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.16 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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.

### **Stratospheric Ozone Protection**

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1**

**EMISSIONS UNIT OPERATION CONDITIONS**

**Emission Unit Description: Woodworking**

- (a) Woodworking operations, consisting of the following:
  - (1) One (1) saw mill, consisting of the following:
    - (A) One (1) debarking process, identified as EU-XIII, constructed in 2004, equipped with a cyclone (Bark Cyclone) and exhausting to Stack A, capacity: 7,513 pounds of logs per hour.
    - (B) One (1) chipper, identified as EU-XIV, constructed in 1987, equipped with a cyclone (Chip Cyclone) and exhausting to Stack E, capacity: 7,513 pounds of logs per hour.
    - (C) Log sawing operations, identified as EU-IX, constructed in 1997, equipped with a cyclone (Sawdust Cyclone) and exhausting to Stack B, capacity: 7,513 pounds of logs per hour.
  - (2) One (1) vat area consisting of a log soaking process with no air emissions.
  - (3) One (1) wet slicing operation, equipped with two (2) slicers, identified as EU-IV and V, constructed in 1964 and 1970, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 2,504 pounds of wet hardwood logs per hour, total.
  - (4) One (1) rotary veneering operation, identified as EU-VI, with no air emissions, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 1,252 pounds of wet hardwood logs per hour.
  - (5) One (1) veneer drying room, with two (2) dryers, identified as EU-II and EU-III, constructed in 1989 and 1991 and exhausting through Stacks 4a and b and 5a and b, respectively, using steam heat from the boiler, capacity: 1,800 pounds of hardwood logs per hour, per dryer.
  - (6) One (1) veneer clipping line, identified as EU-VII, constructed in 1980, equipped with a cyclone (DryVen Cyclone) and exhausting to Stack D, capacity: 4,734 pounds of hardwood logs per hour.
  - (7) One (1) veneer clipping line, identified as EU-VIII, constructed in 1976, equipped with a cyclone (DryVen Cyclone) and exhausting to Stack D, capacity: 1,800 pounds of hardwood logs per hour.
  - (8) Trim sawing operations, identified as EU-X, constructed in 2004, equipped with a cyclone (Planer Cyclone) and exhausting to Stack F, capacity: 3,757 pounds of logs per hour.
  - (10) Rip sawing operations, identified as EU-XI, constructed in 2004, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 1,252 pounds of logs per hour.
  - (11) Radial arm saws, identified as EU-XII, constructed in 1965, capacity: 69.9 pounds of lumber 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 [326 IAC 6-3-2]

- 
- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) clipper, identified as EU-XIV, shall not exceed 9.95 pounds per hour, when operating at a process weight rate of 3.76 tons per hour.
  - (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the log sawing operations, identified as EU-IX, shall not exceed 9.95 pounds per hour, when operating at a process weight rate of 3.76 tons per hour.
  - (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) veneer clipping line, identified as EU-VII, shall not exceed 7.30 pounds per hour, when operating at a process weight rate of 2.37 tons per hour.
  - (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the trim sawing operations, identified as EU-X, shall not exceed 6.25 pounds per hour, when operating at a process weight rate of 1.88 tons per hour.

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

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

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

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Emission Unit Description: Boiler

- (b) One (1) wood waste-fired boiler, identified as EU-I, constructed in 1964, equipped with a fly ash collector, obtaining wood waste from a silo with five (5) cyclones, exhausting through Stack 1, input capacity: 19.2 million British thermal units and 1.92 tons of wood waste per hour.

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

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

#### D.2.1 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) wood waste-fired boiler (EU-I), shall not exceed 0.54 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.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

In order to comply with Condition D.2.1, the fly ash collector for particulate control shall be in operation and control emissions from the one (1) wood waste-fired boiler, identified as EU-I, at all times that the one (1) wood waste-fired boiler is in operation.

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

#### D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the one (1) wood waste-fired boiler stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

**D.2.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the one (1) wood waste-fired boiler stack exhaust. 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, (i.e. 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.

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

**MINOR SOURCE OPERATING PERMIT  
CERTIFICATION**

Source Name: Thiesing Veneer Company, Inc.  
Source Address: 300 Park Drive, Mooresville, Indiana 46158  
Mailing Address: 300 Park Drive, Mooresville, Indiana 46158  
Permit No.: MSOP 109-24196-00006

**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>Thiesing Veneer Company, Inc.</b>
<b>Address:</b>	<b>300 Park Drive</b>
<b>City:</b>	<b>Mooresville, Indiana 46158</b>
<b>Phone #:</b>	<b>(317) 831-4040</b>
<b>MSOP #:</b>	<b>109-24196-00006</b>

I hereby certify that Thiesing Veneer Company, Inc. is

- still in operation.
- no longer in operation.

I hereby certify that Thiesing Veneer Company, Inc. is

- in compliance with the requirements of MSOP 109-24196-00006.
- not in compliance with the requirements of MSOP 109-24196-00006.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Thiesing Veneer Company, Inc.</b>
<b>Source Location:</b>	<b>300 Park Drive, Mooresville, IN 46158</b>
<b>County:</b>	<b>Morgan</b>
<b>SIC Code:</b>	<b>2435</b>
<b>Permit No.:</b>	<b>MSOP 109-24196-00006</b>
<b>Permit Reviewer:</b>	<b>CarrieAnn Paukowits</b>

The Office of Air Quality (OAQ) has reviewed the operating permit application from Thiesing Veneer Company, Inc. relating to the operation of a wood veneer manufacturing source, with the following emission units and pollution control devices:

**Permitted Emission Units and Pollution Control Equipment**

- (a) Woodworking operations, consisting of the following:
  - (1) One (1) saw mill, consisting of the following:
    - (A) One (1) debarking process, identified as EU-XIII, constructed in 2004, equipped with a cyclone (Bark Cyclone) and exhausting to Stack A, capacity: 7,513 pounds of logs per hour.
    - (B) One (1) chipper, identified as EU-XIV, constructed in 1987, equipped with a cyclone (Chip Cyclone) and exhausting to Stack E, capacity: 7,513 pounds of logs per hour.
    - (C) Log sawing operations, identified as EU-IX, constructed in 1997, equipped with a cyclone (Sawdust Cyclone) and exhausting to Stack B, capacity: 7,513 pounds of logs per hour.
  - (2) One (1) vat area consisting of a log soaking process with no air emissions.
  - (3) One (1) wet slicing operation, equipped with two (2) slicers, identified as EU-IV and V, constructed in 1964 and 1970, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 2,504 pounds of wet hardwood logs per hour, total.
  - (4) One (1) rotary veneering operation, identified as EU-VI, with no air emissions, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 1,252 pounds of wet hardwood logs per hour.
  - (5) One (1) veneer drying room, with two (2) dryers, identified as EU-II and EU-III, constructed in 1989 and 1991 and exhausting through Stacks 4a and b and 5a and b, respectively, using steam heat from the boiler, capacity: 1,800 pounds of hardwood logs per hour, per dryer.

- (6) One (1) veneer clipping line, identified as EU-VII, constructed in 1980, equipped with a cyclone (DryVen Cyclone) and exhausting to Stack D, capacity: 4,734 pounds of hardwood logs per hour.
- (7) One (1) veneer clipping line, identified as EU-VIII, constructed in 1976, equipped with a cyclone (DryVen Cyclone) and exhausting to Stack D, capacity: 1,800 pounds of hardwood logs per hour.
- (8) Trim sawing operations, identified as EU-X, constructed in 2004, equipped with a cyclone (Planer Cyclone) and exhausting to Stack F, capacity: 3,757 pounds of logs per hour.
- (10) Rip sawing operations, identified as EU-XI, constructed in 2004, equipped with a cyclone (WetVen Cyclone) and exhausting to Stack C, capacity: 1,252 pounds of logs per hour.
- (11) Radial arm saws, identified as EU-XII, constructed in 1965, capacity: 69.9 pounds of lumber per hour.
- (b) One (1) wood waste-fired boiler, identified as EU-I, constructed in 1964, equipped with a fly ash collector, obtaining wood waste from a silo with five (5) cyclones, exhausting through Stack 1, input capacity: 19.2 million British thermal units and 1.92 tons of wood waste per hour.
- (c) One (1) wood waste-fired stove, identified as EU-XV, constructed in 1992, exhausting through Stack 3, input capacity: 0.6 million British thermal units and 0.06 tons of wood waste per hour.
- (d) One (1) natural gas-fired heater, identified as EU-XVI, constructed in 1958, exhausting through Stack 2, capacity: 1.5 million British thermal units per hour.

### **Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

The source also consists of the following emission units that are operating without a permit:

The one (1) debarking process, identified as EU-XIII, trim sawing operations, identified as EU-X, and rip sawing operations, identified as EU-XI, all constructed in 2004, the one (1) wood waste-fired stove, identified as EU-XV, constructed in 1992, the two (2) dryers, identified as EU-II and EU-III, constructed in 1989 and 1991, and the log sawing operations, identified as EU-IX, constructed in 1997, did not receive pre-construction approval. However, emissions from the total of all facilities constructed in 2004, emissions from the wood waste-fired stove, and emissions from the one (1) veneer drying room are lower than the levels at which a source is required to receive preconstruction approval. Therefore, no approval was required for those modifications to the existing source.

### **History**

On January 12, 2007, Thiesing Veneer Company, Inc. submitted an application to the OAQ requesting a Minor Source Operating Permit.

### **Existing Approvals**

The source has constructed or has been operating under the following approvals as well:

- (a) Operation Permit No. 55-10-7-0035, issued on July 22, 1975;
- (b) Operation Permit No. 55-03-82-0008, issued on April 26, 1978;
- (c) Operation Permit No. 55-04-86-0090, issued on May 10, 1982; and
- (d) Operation Permit No. 55-04-90-0097, issued on September 4, 1986.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this MSOP:

- (a) Operation Permit No. 55-04-90-0097, issued on September 4, 1986

Condition 4: That boiler particulate matter emissions shall be limited to 0.8 pounds per million Btu's heat input, according to 326 IAC 6-2.1.

Reason revised: Based on the 326 IAC 6-2-1, this source is subject to 326 IAC 6-2-2. Based on the equation, the particulate matter emissions are limited to 0.54 pound per million British thermal units.

- (b) Operation Permit No. 55-04-90-0097, issued on September 4, 1986

Condition 5(a): The woodworking particulate matter emissions shall be considered in compliance with 325 IAC 6-3 provided that visible emissions do not exceed 10% opacity; and

Condition 5(c): The woodworking particulate matter emissions shall be considered in compliance with 325 IAC 6-3 provided that no public nuisance is created.

Reason revised: There is no rule requiring less than ten percent (10%) opacity or defining "public nuisance." The woodworking must comply with 326 IAC 6-3, as applicable, and 326 IAC 5-1. See the State Rule Applicability sections of this document for specific requirements.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, they were not incorporated into this MSOP:

Operation Permit No. 55-04-86-0090, issued on May 10, 1982

Emissions shall be at a level acceptable to 326 IAC 7-1.

Reason not incorporated: The boiler does not burn coal as a backup fuel anymore. Therefore, the SO<sub>2</sub> emissions are less than ten (10) pounds per hour and twenty-five (25) tons per year, and the requirements of 326 IAC 7-1.1 are not applicable. The ability to burn coal was removed prior to the permit (OP 55-04-90-0097) issued in 1986, which replaced the 1982 permit upon expiration.

### **Enforcement Issue**

- (a) The most recent Operation Permit for this source expired on April 1, 1990, and the applicant applied for the Minor Source Operating Permit (MSOP) after December 27,

1999. Therefore, the source is not in compliance with the compliance schedule under 326 IAC 2-6.1-3.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
A	debarking process (EU-XIII)	10.0	5.50	unknown	unknown
B	log sawing operations (EU-IX)	10.0	5.50	unknown	unknown
C	wet slicing (EU-IV), rotary veneering (EU-VI) & rip sawing (EU-XI)	10.0	5.50	unknown	unknown
D	veneer clipping (EU-VII & EU-VIII)	11.0	6.00	unknown	unknown
E	chipper (EU-XIV)	10.0	5.50	unknown	unknown
F	trim sawing operations (EU-X)	11.0	6.00	unknown	unknown
1	wood waste-fired boiler (EU-I)	100.0	3.00	unknown	unknown
2	natural gas-fired heater (EU-XVI)	4.00	1.00	unknown	unknown
3	wood waste-fired stove (EU-XV)	5.00	1.00	unknown	unknown
4a	veneer drying (EU-II)	6.00	1.30	unknown	unknown
4b	veneer drying (EU-II)	6.00	2.50	unknown	unknown
5a	veneer drying (EU-III)	6.00	2.00	unknown	unknown
5b	veneer drying (EU-III)	6.00	2.50	unknown	unknown

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Morgan County.

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	nonattainment
SO <sub>2</sub>	attainment
NO <sub>x</sub>	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Morgan 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 law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate 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.

- (b) 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 emissions and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Morgan County has been designated as nonattainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section of this document.
- (c) Morgan 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 revoking the one-hour ozone standard in Indiana.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	71.2
PM <sub>10</sub>	57.8
SO <sub>2</sub>	2.17
VOC	1.16
CO	52.6
NO <sub>x</sub>	19.7

HAPs	tons/year
Acrolein	0.347
Benzene	0.364
Formaldehyde	0.382
Hydrogen Chloride	1.65
Styrene	0.165
Hexane	0.012
Dichlorobenzene, Toluene, Lead, Cadmium, Chromium, Manganese & Nickel	< 0.001, each
Total	2.92

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than one hundred (100) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

### Actual Emissions

No previous emission data has been received from the source.

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Woodworking	22.67	12.95	0.00	0.00	0.00	0.00	0.000
Wood waste-fired boiler	45.41	43.48	2.10	1.09	50.46	18.50	1.60 HCl; 2.82 total
Wood waste-fired stove	1.47	1.36	0.07	0.03	1.58	0.58	0.050 HCl; 0.088 total
Natural gas-fired heater	0.01	0.05	0.00	0.04	0.55	0.66	0.012
<b>Total Emissions</b>	<b>69.6</b>	<b>57.8</b>	<b>2.17</b>	<b>1.16</b>	<b>52.6</b>	<b>19.7</b>	<b>1.65 HCl; 2.92 total</b>

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutant, PM<sub>10</sub> (as a surrogate for PM<sub>2.5</sub>) and NO<sub>x</sub> and VOC (for ozone nonattainment) are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

### Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) The one (1) wood waste-fired boiler was constructed prior to August 17, 1971. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971) are not included in the permit for this source.
- (b) The one (1) wood waste-fired boiler was constructed prior to September 18, 1978. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978), are not included in the permit for this source.
- (c) The one (1) wood waste-fired boiler has a capacity less than 100 million British thermal units per hour. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), are not included in the permit for this source.

- (d) The one (1) wood waste-fired boiler was constructed before June 9, 1989. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), are not included in the permit for this source.
- (e) The one (1) wood waste-fired boiler was manufactured prior to July 1, 1988. Therefore, the requirements of 326 IAC 12, 40 CFR 60, Subpart AAA (Standards of Performance for New Residential Wood Heaters), are not included in the permit.
- (f) The one (1) wood waste-fired stove purchased in 1992 is used as a space heater, but has a weight of 2,400 pounds, which is greater than 1,760 pounds. Therefore, it does not meet the definition of a wood heater pursuant 40 CFR 60.531, and the requirements of 326 IAC 12, 40 CFR 60, Subpart AAA (Standards of Performance for New Residential Wood Heaters), are not included in the permit.
- (g) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDD (National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products), are not included in the permit for this source.
- (h) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters), are not included in the permit for this source.

#### **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 2-4.1 (New Source Toxics Control)**

The operation of this 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 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 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) wood waste-fired boiler, identified as EU-I, rated at 19.2 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 Morgan 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.

$$Pt = 0.87/(19.2)^{0.16} = 0.54 \text{ lb/mmBtu heat input}$$

Based on AP-42 emission factors, the potential particulate emission rate from the one (1) boiler (EU-I) is 0.56 pound per million British thermal units heat input. According to a manufacturer's guarantee, the particulate emission rate will not exceed 0.3 pounds per million British thermal units heat input after control by the fly ash collector. Therefore, the boiler can comply with this rule. The use of the fly ash collector will be required at all times in order for the boiler to comply with this rule.

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

- (a) The particulate emissions from the one (1) debarking operation (EU-XIII), the one (1) wet slicing operation (EU-IV), one (1) veneer clipping line (EU-VIII), rip sawing operations (EU-XI), radial arm saws (EU-XII), one (1) rotary veneering operation (EU-VI), one veneer drying room (EU-II and EU-III), one (1) wood waste-fired stove (EU-XV) and one (1) natural gas-fired heater (EU-XVI) 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.

- (b) The one (1) wood waste-fired boiler, identified as EU-I, performs combustion for indirect heating. Therefore, pursuant to 326 IAC 6-3-1(b)(1), it is exempt from the requirements of 326 IAC 6-3-2.
- (c) The particulate from the one (1) clipper, identified as EU-XIV, shall not exceed 9.95 pounds per hour, when operating at a process weight rate of 3.76 tons per hour. The potential to emit particulate before controls is 1.31 pounds per hour. Therefore, the one (1) clipper can comply with this rule without the cyclone.
- (d) The particulate from the log sawing operations, identified as EU-IX, shall not exceed 9.95 pounds per hour, when operating at a process weight rate of 3.76 tons per hour. The potential to emit particulate before controls is 1.31 pounds per hour. Therefore, the log sawing operations can comply with this rule without the cyclone.
- (e) The particulate from the one (1) veneer clipping line, identified as EU-VII, shall not exceed 7.30 pounds per hour, when operating at a process weight rate of 2.37 tons per hour. The potential to emit particulate before controls is 0.83 pounds per hour. Therefore, the one (1) veneer clipping line can comply with this rule without the cyclone.
- (f) The particulate from the trim sawing operations, identified as EU-X, shall not exceed 6.25 pounds per hour, when operating at a process weight rate of 1.88 tons per hour. The potential to emit particulate before controls is 0.66 pounds per hour. Therefore, the trim sawing operations can comply with this rule without the cyclone.

The limitations in (c) through (f) are determined by the following:

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

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

#### 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.

### **Compliance Determination and Monitoring Requirements**

The compliance requirements applicable to this source are as follows:

- (a) The one (1) wood-waste fired boiler, identified as EU-I, has applicable compliance determination conditions as specified below:

In order to comply with 326 IAC 6-2-2, the fly ash collector for particulate control shall be in operation and control emissions from the one (1) wood waste-fired boiler, identified as EU-I, at all times that the one (1) wood waste-fired boiler is in operation

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

Visible emission notations of the one (1) wood waste-fired boiler stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These conditions are necessary because the fly ash collector for the one (1) wood waste-fired boiler, identified as EU-I, must operate properly to ensure compliance with 326 IAC 6-2-2 (Particulate emission limitations for sources of indirect heating) and 326 IAC 2-6.1 (MSOP).

### **Recommendation**

The staff recommends to the Commissioner that the Minor Source Operating Permit, M 109-24196-00006, 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 12, 2007. Additional information was received on March 29, April 3, April 4, and April 5, 2007.

### **Conclusion**

The operation of this wood veneer manufacturing source shall be subject to the conditions of the attached **MSOP No. 109-24196-00006**.

**Appendix A: Emission Calculations  
Woodworking**

Company Name: Thiesing Veneer Company, Inc.  
Address City IN Zip: 300 Park Drive, Mooresville, IN 46158  
MSOP No.: 109-24196-00006  
Reviewer: CarrieAnn Paukowits  
Date: March 29, 2007

Process	Maximum Throughput lbs/hr	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM Emissions (lbs/hr)	PM10 Emissions (lbs/hr)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)	Control Efficiency	PM Emissions (lbs/hr)	PM10 Emissions (lbs/hr)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)
<b>Saw mill</b>												
Debarking (EU-XIII)	7513	0.02	0.011	0.075	0.041	0.329	0.181	85.00%	0.011	0.006	0.049	0.027
Chipper (EU-XIV)	7513	0.35	0.200	1.31	0.751	5.76	3.29	85.00%	0.197	0.113	0.864	0.494
Log Sawing (EU-IX)	7513	0.35	0.200	1.31	0.751	5.76	3.29	85.00%	0.197	0.113	0.864	0.494
Wet Slicing (EU-IV)	2504	0.35	0.200	0.44	0.250	1.92	1.10	85.00%	0.066	0.038	0.288	0.165
Veneer Clipping (EU-VII)	4734	0.35	0.200	0.83	0.473	3.63	2.07	85.00%	0.124	0.071	0.544	0.311
Veneer Clipping (EU-VIII)	1800	0.35	0.200	0.32	0.180	1.38	0.79	85.00%	0.047	0.027	0.207	0.118
Trim sawing (EU-X)	3757	0.35	0.200	0.66	0.376	2.88	1.65	85.00%	0.099	0.056	0.432	0.247
Rip sawing (EU-XI)	1252	0.35	0.200	0.22	0.125	0.96	0.55	85.00%	0.033	0.019	0.144	0.082
Radial arm saws (EU-XII)	69.9	0.35	0.200	0.01	0.007	0.05	0.03	0.00%	0.012	0.007	0.054	0.031
						<b>22.7</b>	<b>12.9</b>				<b>3.45</b>	<b>1.97</b>

**Methodology**

Emission factors from FIRES 6.23, SCC 3-07-008-01, 3-07-008-02 and 3-07-008-03  
 PM/PM10 Emissions (lbs/hr) = Maximum Throughput (lbs/hr) x 1 ton/2,000 lbs x Emission Factor (lbs/ton)  
 PM/PM10 Emissions (tons/yr) = Emissions (lbs/hr) x 8,760 hrs/yr x 1 lb/2,000 tons

**Appendix A: Emissions Calculations  
External Combustion Boiler  
Wood Waste Combustion (uncontrolled)  
Bark/Bark and Wet Wood**

**Company Name: Thiesing Veneer Company, Inc.  
Address City IN Zip: 300 Park Drive, Mooresville, IN 46158  
MSOP No.: 109-24196-00006  
Reviewer: CarrieAnn Paukowits  
Date: March 29, 2007**

**Boiler**

Capacity (MMBtu/hr)	19.2						
	<b>Pollutant</b>						
	<b>PM*</b>	<b>PM10*</b>	<b>PM2.5*</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO**</b>
Emission Factor in lb/MMBtu	0.56	0.517	0.447	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	47.09	43.48	37.59	2.10	18.50	1.09	50.46
Emission Factor in lb/MMBtu after Control by Fly Ash Collector	0.3	0.3					
Potential to Emit after Control in tons/yr	25.23	25.23					

	<b>Selected Hazardous Air Pollutants</b>				
	<b>Acrolein</b>	<b>Benzene</b>	<b>Form-aldehyde</b>	<b>Hydrogen Chloride</b>	<b>Styrene</b>
Emission Factor in lb/MMBtu	0.00400	0.00420	0.00440	0.01900	0.00190
Potential Emissions in tons/yr	0.336	0.353	0.370	1.598	0.160

**Stove**

Capacity (MMBtu/hr)	0.6						
	<b>Pollutant</b>						
	<b>PM*</b>	<b>PM10*</b>	<b>PM2.5*</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO**</b>
Emission Factor in lb/MMBtu	0.56	0.517	0.447	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	1.47	1.36	1.17	0.07	0.58	0.03	1.58

	<b>Selected Hazardous Air Pollutants</b>				
	<b>Acrolein</b>	<b>Benzene</b>	<b>Form-aldehyde</b>	<b>Hydrogen Chloride</b>	<b>Styrene</b>
Emission Factor in lb/MMBtu	0.00400	0.00420	0.00440	0.01900	0.00190
Potential Emissions in tons/yr	0.011	0.011	0.012	0.050	0.005

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

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

\*\*The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

**Methodology**

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10<sup>6</sup> Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

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

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**

**Company Name: Thiesing Veneer Company, Inc.  
Address City IN Zip: 300 Park Drive, Mooresville, IN 46158  
MSOP No.: 109-24196-00006  
Reviewer: CarrieAnn Paukowits  
Date: March 29, 2007**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.5

13.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.012	0.050	0.004	0.657	0.036	0.552

\*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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000014	0.000008	0.000493	0.011826	0.000022

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.00000	0.00001	0.00001	0.000002	0.00001	<b>0.012</b>

**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

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 Summary**

**Company Name: Thiesing Veneer Company, Inc.**  
**Address City IN Zip: 300 Park Drive, Mooresville, IN 46158**  
**MSOP No.: 109-24196-00006**  
**Reviewer: CarrieAnn Paukowitz**  
**Date: March 29, 2007**

**Unrestricted Potential to Emit (tons/yr)**

Process	PM	PM10	SO2	NOx	VOC	CO
Woodworking	22.67	12.95	0.00	0.00	0.00	0.00
Wood waste-fired boiler	47.09	43.48	2.10	18.50	1.09	50.46
Wood waste-fired stove	1.47	1.36	0.07	0.58	0.03	1.58
Natural gas-fired heater	0.01	0.05	0.00	0.66	0.04	0.55
<b>Total</b>	<b>71.2</b>	<b>57.8</b>	<b>2.17</b>	<b>19.7</b>	<b>1.16</b>	<b>52.6</b>

	Acrolein	Benzene	Form-aldehyde	Hydrogen Chloride	Styrene	Hexane	Total HAPs
Woodworking	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Wood waste-fired boiler	0.336	0.353	0.370	1.598	0.160	0.000	2.817
Wood waste-fired stove	0.011	0.011	0.012	0.050	0.005	0.000	0.088
Natural gas-fired heater	0.000	0.000	0.000	0.000	0.000	0.012	0.012
<b>Total</b>	<b>0.347</b>	<b>0.364</b>	<b>0.382</b>	<b>1.65</b>	<b>0.165</b>	<b>0.012</b>	<b>2.92</b>

**Controlled Potential to Emit (tons/yr)**

Process	PM	PM10	SO2	NOx	VOC	CO
Woodworking	3.45	1.97	0.00	0.00	0.00	0.00
Wood waste-fired boiler	25.23	25.23	2.10	18.50	1.09	50.46
Wood waste-fired stove	1.47	1.36	0.07	0.58	0.03	1.58
Natural gas-fired heater	0.01	0.05	0.00	0.66	0.04	0.55
<b>Total</b>	<b>30.2</b>	<b>28.6</b>	<b>2.17</b>	<b>19.7</b>	<b>1.16</b>	<b>52.6</b>

	Acrolein	Benzene	Form-aldehyde	Hydrogen Chloride	Styrene	Hexane	Total HAPs
Woodworking	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Wood waste-fired boiler	0.336	0.353	0.370	1.598	0.160	0.000	2.817
Wood waste-fired stove	0.011	0.011	0.012	0.050	0.005	0.000	0.088
Natural gas-fired heater	0.000	0.000	0.000	0.000	0.000	0.012	0.012
<b>Total</b>	<b>0.347</b>	<b>0.364</b>	<b>0.382</b>	<b>1.65</b>	<b>0.165</b>	<b>0.012</b>	<b>2.92</b>

**Limited Potential to Emit (tons/yr)**

Process	PM	PM10	SO2	NOx	VOC	CO
Woodworking	22.67	12.95	0.00	0.00	0.00	0.00
Wood waste-fired boiler	45.41	43.48	2.10	18.50	1.09	50.46
Wood waste-fired stove	1.47	1.36	0.07	0.58	0.03	1.58
Natural gas-fired heater	0.01	0.05	0.00	0.66	0.04	0.55
<b>Total</b>	<b>69.6</b>	<b>57.8</b>	<b>2.17</b>	<b>19.7</b>	<b>1.16</b>	<b>52.6</b>

	Acrolein	Benzene	Form-aldehyde	Hydrogen Chloride	Styrene	Hexane	Total HAPs
Woodworking	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Wood waste-fired boiler	0.336	0.353	0.370	1.598	0.160	0.000	2.817
Wood waste-fired stove	0.011	0.011	0.012	0.050	0.005	0.000	0.088
Natural gas-fired heater	0.000	0.000	0.000	0.000	0.000	0.012	0.012
<b>Total</b>	<b>0.347</b>	<b>0.364</b>	<b>0.382</b>	<b>1.65</b>	<b>0.165</b>	<b>0.012</b>	<b>2.92</b>