



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 13, 2007

RE: Robert Weed Plywood Corporation / 039-25383-00178

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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100 North Senate Avenue
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New Source Review and Part 70 Operating Permit OFFICE OF AIR QUALITY

**Robert Weed Plywood Corporation
705 Maple Street
Bristol, Indiana 46507**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions

Operation Permit No.: T039-25383-00178	
Issued by: <i>Original document signed by</i> Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 13, 2007 Expiration Date: December 13, 2012

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source consisting of lamination, coating, sizing, and distribution of wood substrates including ceiling panels, wall panels, counter tops, cabinet components, other miscellaneous wood products, and all related trim and mouldings.

Source Address:	705 Maple Street, Bristol, Indiana 46507
Mailing Address:	P.O. Box 487, Bristol, Indiana 46507
General Source Phone Number:	574-848-7631
SIC Code:	2431, 5031, 2541, and 2499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) wood curtain coater, equipped with flowcoater applicators, installed in 1993, capacity: 5,120 square feet of hard/softwood per hour.
- (b) Four (4) panel laminators, known as Lam-1, Lam-2, Lam-3, and Lam-4, equipped with roll coating applicators, installed in 1986, 1990, 1995, and 2001, capacity: 8,700 square feet of hard/softwood, veneer, and/or plywood per hour each.
- (c) One (1) ink coater, installed in 2003, capacity: 2,130 square feet of hard/softwood, veneer, and/or plywood per hour.
- (d) One (1) wood surface coating operation, identified as EU-02, approved for construction in 2007, including the following:
 - (1) One (1) Spray 1 staining system, identified as FE-1, approved for construction in 2007, using air-assisted airless spray application of a solvent-based stain, using dry filters for particulate control, exhausting through Stack F1;
 - (2) One (1) fan coater, identified as FE-4, approved for construction in 2007, using a non-atomizing flowcoating application of a solvent-based coating, exhausting through Stack F4;
 - (3) One (1) Paint-O-Matic coating system, identified as FE-5, approved for construction in 2007, using air-assisted airless vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stack F8;

- (4) One (1) Giardina coating system, identified as FE-7, approved for construction in 2007, using high-volume, low-pressure (HVLP) vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stacks F7.1 and F7.2;
 - (5) One (1) Spray 2 staining system, identified as FE-8, approved for construction in 2007, using high-volume, low-pressure (HVLP) application of a water-based stain, using dry filters for particulate control, exhausting through Stack F8;
 - (6) One (1) three-level conveyor/drying system, approved for construction in 2007, equipped with a natural gas drying oven rated at 3.5 MMBtu/hr, servicing FE-1, FE-4, FE-5, and FE-8, exhausting through Stacks FC2 and FC3;
- (e) Woodworking operations in Buildings 5, 6, 16, 14N, 31, and 32, consisting of chop saws, multi-blade saws, single blade saws, drilling machines, edge banders, foilers, moulders, routers, sanders, and shapers. Particulate emissions from the woodworking operations are controlled by baghouses as follows:
- (1) Building 5 and Building 6 Woodworking Operations, with a combined maximum capacity of 7,821.34 pounds of wood per hour, with particulate emission controlled by Baghouse DC-01, installed in 1990;
 - (2) Building 31 and Building 32 Woodworking Operations, with a combined maximum capacity of 1,500 pounds of wood per hour, with particulate emission controlled by Baghouse DC-02, installed in 1978;
 - (3) Building 14N Woodworking Operations A, with a maximum capacity of 3,910.67 pounds of wood per hour, with particulate emission controlled by Baghouse DC-04 installed in 2000.
 - (4) Building 16 Woodworking Operations, with a maximum capacity of 23,374.61 pounds of wood per hour, with particulate emission controlled by Baghouse DC-05 installed in February 2000.
 - (5) Building 14N Woodworking Operations B, approved for construction in 2007, with a maximum capacity of 2932.8 pounds of wood per hour, with particulate emission controlled by Baghouse DC-06 and exhausting to the indoors, approved for installation in 2007.
 - (6) One (1) saw dust conveying system, approved for construction in 2007, pneumatically conveying saw dust captured by Baghouses DC-04, DC-05, and DC-06 to one (1) sawdust storage silo, controlled by an accumulation Baghouse DC-07.

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

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

- (a) Eleven (11) wood veneer wrappers, equipped with roll coating applicators, installed in 1985, 1985, 1985, 1992, 1995, 1996, 1997, 1999, 2004, 2004, and 2005, capacity: 1,155 square feet of veneer per hour each.
- (b) One (1) natural gas-fired dryer, known as F-1, installed in 1993, rated at 1.20 million British thermal units per hour.
- (c) Ninety-five (95) natural gas-fired infrared heaters, known as H1 through H95, installed in between 1990 and 1998, rated at 0.125 million British thermal units per hour, each.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

- (a) This permit, T039-25383-00178, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.4 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.5 Enforceability [326 IAC 2-7-7]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T039-25383-00178 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.15 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

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

- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.23 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.25 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1][IC 13-17-9]

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

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

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

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

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

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

326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

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

The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

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

- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the

private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) wood curtain coater, equipped with flowcoater applicators, installed in 1993, capacity: 5,120 square feet of hard/softwood per hour.
- (b) Four (4) panel laminators, known as Lam-1, Lam-2, Lam-3, and Lam-4, equipped with roll coating applicators, installed in 1986, 1990, 1995, and 2001, capacity: 8,700 square feet of hard/softwood, veneer, and/or plywood per hour each.
- (c) One (1) ink coater, installed in 2003, capacity: 2,130 square feet of hard/softwood, veneer, and/or plywood per hour.
- (d) One (1) wood surface coating operation, identified as EU-02, approved for construction in 2007, including the following:
 - (1) One (1) Spray 1 staining system, identified as FE-1, approved for construction in 2007, using air-assisted airless spray application of a solvent-based stain, using dry filters for particulate control, exhausting through Stack F1;
 - (2) One (1) fan coater, identified as FE-4, approved for construction in 2007, using a non-atomizing flowcoating application of a solvent-based coating, exhausting through Stack F4;
 - (3) One (1) Paint-O-Matic coating system, identified as FE-5, approved for construction in 2007, using air-assisted airless vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stack F8;
 - (4) One (1) Giardina coating system, identified as FE-7, approved for construction in 2007, using high-volume, low-pressure (HVLP) vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stacks F7.1 and F7.2;
 - (5) One (1) Spray 2 staining system, identified as FE-8, approved for construction in 2007, using high-volume, low-pressure (HVLP) application of a water-based stain, using dry filters for particulate control, exhausting through Stack F8;
 - (6) One (1) three-level conveyor/drying system, approved for construction in 2007, equipped with a natural gas drying oven rated at 3.5 MMBtu/hr, servicing FE-1, FE-4, FE-5, and FE-8, exhausting through Stacks FC2 and FC3;

(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 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 2-2]

- (a) The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 246 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit, combined with the potential VOC emissions from all other emission units at this source, shall limit the source-wide total potential to emit VOC to less than 250 tons per 12 consecutive month period and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) Minor Limit [40 CFR 63, Subpart JJ][326 IAC 2-4.1]

- (a) The total input of each individual HAP from coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 9.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential HAP emissions from all other emission units at this source, shall limit the potential to emit each individual HAP to less than 10 tons per year from the entire source and render 40 CFR 63, Subpart JJ (Wood Furniture NESHAP) and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) not applicable.

- (b) The total input of any combination of HAPs from coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 24.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential HAP emissions from all other emission units at this source, shall limit the potential to emit any combination of HAPs to less than 25 tons per year from the entire source and render 40 CFR 63, Subpart JJ (Wood Furniture NESHAP) and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) not applicable.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from emission units FE-1, FE-5 and FE-8 shall each be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission units FE-1, FE-5 and FE-8 and their control devices.

Compliance Determination Requirements [326 IAC 2-1.1-][326 IAC 2-7-6(1)]

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

- (a) Compliance with the VOC and HAP input limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) If the amount of VOC and HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC and HAP input reported, the Permittee shall determine the VOC and HAP content of the waste shipped offsite using one or a combination of the following methods:
- (1) On-Site Sampling
 - (A) VOC and HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
 - (B) A representative sample of the VOC and HAP containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit T039-25383-00178.
 - (C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
 - (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC and HAP content of the VOC and HAP containing waste. Such change could include, but is not limited to, the following:
 - (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
 - (ii) An operational change in the coating application or cleanup operations.

The new VOC and HAP content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

- (2) Certified Waste Report: The VOC and HAP reported by analysis of an off-site waste processor may be used, provided the report certifies the amount of VOC and HAP in the waste.
- (3) Minimum Assumed VOC and HAP content: The VOC and HAP content of the waste shipped off site may be assumed to be equal to the VOC and HAP content of the material with the lowest VOC and HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC and HAP data sheets, for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC- and HAP-containing waste stream and conduct an analysis for VOC and HAP content.
- (d) Compliance with the VOC and HAP input limitations contained in Conditions D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC and HAP input for the previous month, minus the amount of VOC and HAP in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC or HAP input, minus the amount VOC or HAP in the waste shipped out for recycling or disposal, so as to arrive at VOC or HAP input for the most recent twelve (12) consecutive month period.
- (e) The VOC or HAP input for a month shall be calculated using one of the following equations:

$$\text{VOC input} = \text{SCL}_{\text{VOC}} - \text{SR}_{\text{VOC}}$$

$$\text{HAP input} = \text{SCL}_{\text{HAP}} - \text{SR}_{\text{HAP}}$$

Where:

SCL_{VOC} = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, for the surface coating operations; and

SR_{VOC} = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the surface coating operations.

SCL_{HAP} = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, for the surface coating operations; and

SR_{HAP} = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the surface coating operations.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from emission units FE-1, FE-5 and FE-8 while one or more of the facilities are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C -

Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is 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 2-7-5(3)][326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limits, and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material, dilution solvent, and cleaning solvent used.
- (2) The amount of coating material, dilution solvent, and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (3) If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.1.6, then the following records shall be maintained:
- (A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
- (B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
- (C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.
- (4) The total VOC input for each month;
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the single HAP and total HAP input limits, and to document the quantity of any single HAP and total HAP shipped offsite and deducted from total reported single HAP and total HAP usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The single HAP and total HAP content of each coating material, dilution solvent, and cleaning solvent used.
- (2) The amount of coating material, dilution solvent, and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (3) If the amount of single HAP and total HAP in waste material is being deducted from the single HAP and total HAP input as allowed in paragraph (b) of Condition D.1.6, then the following records shall be maintained:
 - (A) The amount of single HAP and total HAP containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
 - (B) The single HAP and total HAP content of the waste and all records necessary to verify the amount and single HAP and total HAP content of the single HAP and total HAP containing waste shipped out for recycling or disposal.
 - (C) The weight of single HAP and total HAP input, minus the weight of single HAP and total HAP shipped out to be recycled or disposed, for each compliance period.
- (4) The total single HAP and total HAP input for each month;
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(f) Woodworking operations in Buildings 5, 6, 16, 14N, 31, and 32, consisting of chop saws, multi-blade saws, single blade saws, drilling machines, edge banders, foilers, moulders, routers, sanders, and shapers. Particulate emissions from the woodworking operations are controlled by baghouses as follows:

- (1) Building 5 and Building 6 Woodworking Operations, with a combined maximum capacity of 7,821.34 pounds of wood per hour, with particulate emission controlled by Baghouse DC-01, installed in 1990;
- (2) Building 31 and Building 32 Woodworking Operations, with a combined maximum capacity of 1,500 pounds of wood per hour, with particulate emission controlled by Baghouse DC-02, installed in 1978;
- (3) Building 14N Woodworking Operations A, with a maximum capacity of 3,910.67 pounds of wood per hour, with particulate emission controlled by Baghouse DC-04 installed in 2000.
- (4) Building 16 Woodworking Operations, with a maximum capacity of 23,374.61 pounds of wood per hour, with particulate emission controlled by Baghouse DC-05 installed in February 2000.
- (5) Building 14N Woodworking Operations B, approved for construction in 2007, with a maximum capacity of 2932.8 pounds of wood per hour, with particulate emission controlled by Baghouse DC-06 and exhausting to the indoors, approved for installation in 2007.
- (6) One (1) saw dust conveying system, approved for construction in 2007, pneumatically conveying saw dust captured by Baghouses DC-04, DC-05, and DC-06 to one (1) sawdust storage silo, controlled by an accumulation Baghouse DC-07.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the woodworking operations shall not exceed the following allowable emission rates:

Baghouse ID	Process Weight Rate (pounds/hour)	Process Weight Rate (tons/hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (pounds/hour)
DC-01	7821.34	3.91	10.22
DC-02	1500.00	0.75	3.38
DC-04	3910.67	1.96	6.43
DC-05	23374.61	11.69	21.29
DC-06	14141.6	7.07	15.20
DC-07	41426.88	20.71	31.24

The allowable rate of emission was calculated using the following equation:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

D.2.2 Particulate Matter [326 IAC 2-2]

The PM and PM10 emissions from each of the woodworking operations shall not exceed the emission limits listed in the table below:

Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
DC-01	6.77	6.77
DC-02	2.14	2.14
DC-04	4.03	4.03
DC-05	4.03	4.03
DC-06	8.31	8.31
DC-07	2.57	2.57

Compliance with these limits, combined with the potential PM and PM10 emissions from all other emission units at this source, shall limit the source-wide total potential to emit PM and PM10 to less than 250 tons per 12 consecutive month period, each, and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Air Quality Requirements [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-1.1-5 (Air Quality Requirements) and in order to ensure compliance with the National Ambient Air Quality Standards (NAAQS) for PM10, Baghouse DC-06 shall exhaust to the indoors at all times that the Building 14N Woodworking Operations B are in operation.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.5 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, each of the baghouses for particulate control shall be in operation and control emissions from each of the woodworking operations at all times that the woodworking operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.6 Visible Emissions Notations

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

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of each woodworking operation 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 (e.g., the process did not operate that day).

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Robert Weed Plywood Corporation
Source Address: 705 Maple Street, Bristol, Indiana 46507
Mailing Address: P.O. Box 487, Bristol, Indiana 46507
Part 70 Permit No.: T039-25383-00178

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Robert Weed Plywood Corporation
Source Address: 705 Maple Street, Bristol, Indiana 46507
Mailing Address: P.O. Box 487, Bristol, Indiana 46507
Part 70 Permit No.: T039-25383-00178

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

PART 70 Operating Permit Quarterly Report

Source Name: Robert Weed Plywood Corporation
 Source Address: 705 Maple Street, Bristol, Indiana 46507
 Mailing Address: P.O. Box 487, Bristol, Indiana 46507
 Part 70 Permit No.: T039-25383-00178
 Facility: Surface Coating Operations and Solvent Usage
 Parameter: Volatile Organic Compound (VOC) Input
 Limit: The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 246 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

The VOC input for a month shall be calculated using the following equation:

$$\text{VOC input} = \text{SCL}_{\text{VOC}} - \text{SR}_{\text{VOC}}$$

Where:

- SCL_{VOC} = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, for the surface coating operations; and
- SR_{VOC} = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the surface coating operations.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month	VOC Input Previous 11 Months	VOC Input 12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

PART 70 Operating Permit Quarterly Report

Source Name: Robert Weed Plywood Corporation
 Source Address: 705 Maple Street, Bristol, Indiana 46507
 Mailing Address: P.O. Box 487, Bristol, Indiana 46507
 Part 70 Permit No.: T039-25383-00178
 Facility: Surface Coating Operations and Solvent Usage
 Parameter: Single HAP Input
 Limit: The total input of each individual HAP from coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 9.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

The HAP input for a month shall be calculated using the following equation:

$$\text{HAP input} = \text{SCL}_{\text{HAP}} - \text{SR}_{\text{HAP}}$$

Where:

- SCL_{HAP} = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, for the surface coating operations; and
- SR_{HAP} = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the surface coating operations.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

PART 70 Operating Permit Quarterly Report

Source Name: Robert Weed Plywood Corporation
 Source Address: 705 Maple Street, Bristol, Indiana 46507
 Mailing Address: P.O. Box 487, Bristol, Indiana 46507
 Part 70 Permit No.: T039-25383-00178
 Facility: Surface Coating Operations and Solvent Usage
 Parameter: Total HAP Input
 Limit: The total input of any combination of HAPs from coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 24.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

The HAP input for a month shall be calculated using the following equation:

$$\text{HAP input} = \text{SCL}_{\text{HAP}} - \text{SR}_{\text{HAP}}$$

Where:

- SCL_{HAP} = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, for the surface coating operations; and
- SR_{HAP} = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the surface coating operations.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total HAP This Month	Total HAP Previous 11 Months	Total HAP 12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Robert Weed Plywood Corporation
 Source Address: 705 Maple Street, Bristol, Indiana 46507
 Mailing Address: P.O. Box 487, Bristol, Indiana 46507
 Part 70 Permit No.: T039-25383-00178

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a FESOP Transitioning to a Part 70 Permit
with New Source Review (NSR)

Source Description and Location

Source Name: Robert Weed Plywood Corporation
 Source Location: 705 Maple Street, Bristol, Indiana 46507
 County: Elkhart
 SIC Code: 2431, 5031, 2541, and 2499
 NSR and Part 70 Operating Permit No.: T039-25383-00178
 Permit Reviewer: Nathan C. Bell

History

Robert Weed Plywood Corporation was issued a Federally Enforceable State Operating Permit (FESOP) No. F039-11882-00178 on September 13, 2001, for a stationary hardwood/softwood veneer, plywood, and furniture parts manufacturing source located at 705 Maple Street, Bristol, Indiana 46507. On June 18, 2007, the Office of Air Quality (OAQ) received an application from the source related to the construction and operation of new surface coating operations, wood working equipment, two (2) baghouses, a pneumatic saw dust conveyance system, a saw dust storage silo, four (4) wood veneer wrappers, and an ink coater. On September, 17, 2007, Robert Weed Plywood Corporation provided updated information regarding the air flow rate and outlet grain loading for each of the existing baghouses controlling the woodworking operation. Based on this updated information, the source requested to transition from a FESOP to a Part 70 Permit. On September 28, 2007, the Office of Air Quality (OAQ) received an application from the source to transition from a FESOP to a Part 70 Permit.

Robert Weed Plywood Corporation submitted a FESOP Renewal application on December 14, 2005. Since the source is being issued a Part 70 Permit, a FESOP Renewal will not be issued.

Existing Approvals

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

- (a) FESOP No. 039-11882-00178, issued on September 13, 2001;
- (b) First Administrative Amendment No. F039-15133-00178, issued on February 7, 2002;
- (c) Second Administrative Amendment No. F039-17627-00178, issued on April 30, 2003;
- (d) First Minor Permit Revision No. F039-14910-00178, issued on May 17, 2005.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment or Unclassifiable
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment or Unclassifiable
8-Hour Ozone	Attainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Elkhart County has been designated as attainment for the 8-hour ozone standard. Therefore, VOC and NOx 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.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 Since this type of operation is not in 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.

Source Status

The table below summarizes the potential to emit after controls of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Process/emission unit	Potential To Emit (tons/year)							Worst Single HAP
	PM	PM-10 ⁽¹⁾	SO ₂	NO _x	VOC	CO	Total HAPs	
Surface Coating Operations ⁽²⁾	0	0	0	0	24.66	0	6.36	6.35
Woodworking Operation	180	less than 99.0 ⁽³⁾	0	0	0	0	0	0
Heaters and Dryer ⁽²⁾	0.11	0.44	0.03	5.73	0.31	4.81	0.10	0.11
Total Limited PTE	180.11	less than 99.44	0.03	5.73	24.98	4.81	6.46	6.35

(1) US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions
 (2) Uncontrolled potential to emit.
 (3) Limited potential to emit. Pursuant to F 039-11882-00178, the potential to emit PM10 from the entire woodworking operation was previously limited to less than 99.0 tons per year. In order to comply with this limit, the baghouses for PM10 control were required to be in operation and control emissions from the woodworking at all times that the woodworking facilities were in operation.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no regulated attainment pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act.
- (c) These emissions are based upon The TSD for FESOP No. 039-11882-00178, issued on September 13, 2001.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ PM/PM10 emission data and 2006 VOC and HAP emission data provided by the source.

Pollutant	Emissions (tons/yr)
PM	1.0
PM10	1.0
SO ₂	NR
NO _x	NR
VOC	8.95
CO	NR
Worst Single HAP	1.44 (Toluene)
Total HAPs	1.91

NR = Not Reported

Background and Description of New Source Construction and Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Robert Weed Plywood Corporation on June 18, 2007, relating to the construction and operation of new surface coating operations, wood working equipment, two (2) baghouses, a pneumatic saw dust conveyance system, a saw dust storage silo, four (4) wood veneer wrappers, and an ink coater. Based on the new emission units, the source is now described as a stationary source consisting of lamination, coating, sizing, and distribution of wood substrates including ceiling panels, wall panels, counter tops, cabinet components, other miscellaneous wood products, and all related trim and mouldings.

The following is a list of the new emission units and pollution control devices proposed at this source during this review process:

- (a) One (1) wood surface coating operation, identified as EU-02, approved for construction in 2007, including the following:
 - (1) One (1) Spray 1 staining system, identified as FE-1, approved for construction in 2007, using air-assisted airless spray application of a solvent-based stain, using dry filters for particulate control, exhausting through Stack F1;
 - (2) One (1) fan coater, identified as FE-4, approved for construction in 2007, using a non-atomizing flowcoating application of a solvent-based coating, exhausting through Stack F4;
 - (3) One (1) Paint-O-Matic coating system, identified as FE-5, approved for construction in 2007, using air-assisted airless vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stack F8;
 - (4) One (1) Giardina coating system, identified as FE-7, approved for construction in 2007, using high-volume, low-pressure (HVLP) vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stacks F7.1 and F7.2;
 - (5) One (1) Spray 2 staining system, identified as FE-8, approved for construction in 2007, using high-volume, low-pressure (HVLP) application of a water-based stain, using dry filters for particulate control, exhausting through Stack F8;

- (6) One (1) three-level conveyor/drying system, approved for construction in 2007, equipped with a natural gas drying oven rated at 3.5 MMBtu/hr, servicing FE-1, FE-4, FE-5, and FE-8, exhausting through Stacks FC2 and FC3;
- (b) Building 14N Woodworking Operations B, approved for construction in 2007, with a maximum capacity of 2932.8 pounds of wood per hour, with particulate emission controlled by Baghouse DC-06 and exhausting to the indoors, approved for installation in 2007.
- (c) One (1) saw dust conveying system, approved for construction in 2007, pneumatically conveying saw dust captured by Baghouses DC-04, DC-05, and DC-06 to one (1) sawdust storage silo, controlled by an accumulation Baghouse DC-07.

Permitted Emission Units and Insignificant Activities
--

The following is a list of the permitted emission units and pollution control devices at this source:

- (a) One (1) wood curtain coater, equipped with flowcoater applicators, installed in 1993, capacity: 5,120 square feet of hard/softwood per hour.
- (b) Four (4) panel laminators, known as Lam-1, Lam-2, Lam-3, and Lam-4, equipped with roll coating applicators, installed in 1986, 1990, 1995, and 2001, capacity: 8,700 square feet of hard/softwood, veneer, and/or plywood per hour each.
- (c) One (1) ink coater, installed in 2003, capacity: 2,130 square feet of hard/softwood, veneer, and/or plywood per hour.
- (d) Woodworking operations in Buildings 5, 6, 16, 14N, 31, and 32, consisting of chop saws, multi-blade saws, single blade saws, drilling machines, edge banders, foilers, moulders, routers, and sanders, shapers. Particulate emissions from the woodworking operations are controlled by baghouses as follows:
 - (1) Building 5 and Building 6 Woodworking Operations, with a combined maximum capacity of 7,821.34 pounds of wood per hour, with particulate emission controlled by Baghouse DC-01, installed in 1990;
 - (2) Building 31 and Building 32 Woodworking Operations, with a combined maximum capacity of 1,500 pounds of wood per hour, with particulate emission controlled by Baghouse DC-02, installed in 1978;
 - (3) Building 14N Woodworking Operations A, with a maximum capacity of 3,910.67 pounds of wood per hour, with particulate emission controlled by Baghouse DC-04 installed in 2000.
 - (4) Building 16 Woodworking Operations, with a maximum capacity of 23,374.61 pounds of wood per hour, with particulate emission controlled by Baghouse DC-05 installed in February 2000.

The following is a list of the permitted insignificant activities, as defined in 326 IAC 2-7-1(21), at this source:

- (a) Eleven (11) wood veneer wrappers, equipped with roll coating applicators, installed in 1985, 1985, 1985, 1992, 1995, 1996, 1997, 1999, 2004, 2004, and 2005, capacity: 1,155 square feet of veneer per hour each.
- (b) One (1) natural gas-fired dryer, known as F-1, installed in 1993, rated at 1.20 million British thermal units per hour.
- (c) Ninety-five (95) natural gas-fired infrared heaters, known as H1 through H95, installed in between 1990 and 1998, rated at 0.125 million British thermal units per hour, each.

Emission Units Removed

The following is a list of the emission units removed from the source:

- (a) One (1) ink coater, installed in 1993, capacity: 2,130 square feet of hard/softwood, veneer, and/or plywood per hour.

Enforcement Issues

There are no pending enforcement actions pending.

Stack Summary

Stack ID	Emission Unit	Location	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
DC-01	Woodworking operations controlled by Baghouse DC-01	Building 5 and Building 6	20	4	39500	68
DC-02	Woodworking operations controlled by Baghouse DC-02	Building 31 and Building 32	12	2	12500	68
DC-04	Woodworking operations controlled by Baghouse DC-04	Building 14N	12.5	3.67	23500	68
DC-05	Woodworking operations controlled by Baghouse DC-05	Building 16	22	4.5	23500	68
DC-06	Woodworking operations controlled by Baghouse DC-06	Building 14N (exhausting indoors)	15	5.5	48500	68
DC-07	Woodworking operations controlled by Baghouse DC-07	Building 16 and Building 14N	93	4.5	15000	68
F1	Spray 1 staining system (FE-1)	Building 30	21	1.5	2110	68
F4	Fan coater (FE-4)	Building 30	21.5	1	1245	68
F8	Paint-O-Matic coating system (FE-5)	Building 30	20.5	2	6555	68
F7.1	Giardina coating system (FE-7)	Building 30	30	0.67	6555	68
F7.2	Giardina coating system (FE-7)	Building 30	30	0.67	6555	68
F8	Spray 2 staining system (FE-8)	Building 30	24.5	1.33	2110	68
FC2	EU-02 three-level conveyor/drying system	Building 30	22	2	6555	68
FC3	EU-02 three-level conveyor/drying system	Building 30	22	2	6555	68

Emission Calculations

For detailed emission calculations, see Appendix A pages 1 through 5.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-7-1(29), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table reflects the PTE of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process Description	Uncontrolled/Unlimited Potential to Emit (tons/year)							Worst Single HAP
	PM	PM10 ⁽¹⁾	SO2	NOx	VOC	CO	Total HAPs	
Surface Coating Operations ⁽²⁾	0	0	0	0	390.5	0	233.56	98.98 (methanol)
Woodworking Operation ⁽²⁾	> 250	> 100	0	0	0	0	0	0
Heaters and Dryers ⁽²⁾	0.11	0.44	0.04	7.26	0.40	6.10	0.14	0.13
Total Limited PTE of the Entire Source	> 250	> 100	0.04	7.26	390.9	6.10	233.70	98.98 (methanol)
Title V Major Threshold Level ⁽³⁾	NA	100	100	100	100	100	25	10

NA = Not applicable
 (1) US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions
 (2) Uncontrolled/Unlimited potential to emit.
 (3) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

This source is transitioning from a FESOP to a Part 70 Permit. After issuance of the Part 70 Permit, this source will be classified as a major source for PM10 under Title V, since the potential to emit PM10 of the entire source will be greater than the Title V major threshold levels. The source will limit the potential to emit of any single HAP to less than 10 tons per year, and total HAPs to less than 25 tons per year.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 Permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process Description	Limited Potential to Emit (tons/year)							Worst Single HAP
	PM	PM10 ⁽¹⁾	SO2	NOx	VOC	CO	Total HAPs	
Curtain Coater	0	0	0	0	less than 246.0 ⁽³⁾	0	less than 24.0 ⁽³⁾	less than 9.4 ⁽³⁾
Panel Laminators (Lam-1 - Lam-4)	0	0	0	0		0		
Spray 1 Staining System (FE-1)	30.20 ⁽⁴⁾	30.20 ⁽⁴⁾	0	0		0		
Fancoater Coating System (FE-4)	0	0	0	0		0		
Paint-O-Matic System (FE-5)	2.72 ⁽⁴⁾	2.72 ⁽⁴⁾	0	0		0		
Spray 2 Staining System (FE-8)	13.07 ⁽⁴⁾	13.07 ⁽⁴⁾	0	0		0		
Cleaning Solvents	0	0	0	0	0	0	0	0
Ink Coater ⁽⁴⁾	0	0	0	0	1.42	0	2.5E-03	2.4E-03
Vaneer Wrappers ⁽⁴⁾	0	0	0	0	7.1E-04	0	0	0
Giardina Coating System (FE-7) ⁽⁴⁾	2.04	2.04	0	0	0	0	0.02	0.02
Woodworking Operation ^{(2),(3)}	less than 122.0	less than 122.0	0	0	0	0	0	0
Heaters and Dryers ⁽⁴⁾	0.14	0.55	0.04	7.26	0.40	6.10	0.14	0.13
Total Limited PTE of the Entire Source	less than 170.2	less than 170.6	0.04	7.26	less than 247.8	6.10	less than 24.15	less than 9.55
PSD Major Threshold Level	250	250	250	250	250	250	NA	NA

NA = Not applicable
 (1) US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions
 (2) Controlled potential to emit. The woodworking operations are controlled by baghouses.
 (3) Limited potential to emit.
 (4) Uncontrolled/Unlimited potential to emit.

This modification to an existing minor PSD stationary source will not change the PSD minor status, because the emissions from the entire source will be less than or limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The source will limit the potential to emit VOC, PM, and PM10 to less than 250 tons per year, each, any single HAP to less than 10 tons per year, and total HAPs to less than 25 tons per year.

Federal Rule Applicability Determination

The following federal rules are applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this permit.
- (c) The requirements of the 40 CFR 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing (40 CFR 63.800 - 63.808) (326 IAC 20-14), are not included in this permit. The source will limit the potential to emit of each single HAP to less than 10 tons per year, and total HAPs to less than 25 tons per year. Therefore, this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:
 - (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following tables are used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each emission unit at this source:

CAM Applicability - PM10							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE of PM10 (tons/year)	Controlled PTE of PM10 (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Ink Coater, Curtain Coater, Vaneer Wrappers, Panel Laminators, FE-4	none	N	0.0	NA	100	N	N
Emission units FE-1, FE-5, FE-7, and FE-8	Dry Filters	N	<100	<100	100	N	N
Each Woodworking Operation	Baghouse	Y ⁽¹⁾	>100	<100	100	Y	N
Each Heater, Dryer (F1), and Drying Oven	none	N	<100	NA	100	N	N
(1) PM10 emissions from the woodworking operations shall be controlled by baghouses in order to render 326 IAC 2-2 (PSD) not applicable.							

Compliance Assurance Monitoring (CAM) requirements for each of the woodworking operations will not be required in this Part 70 Permit, but will be required in the Part 70 Permit Renewal.

CAM Applicability - VOC							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE of VOC (tons/year)	Controlled PTE of VOC (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Surface Coating Operations and Solvent Usage	none	Y	>100	>100	100	N	N
Each Woodworking Operation	none	N	0	NA	100	N	N
Each Heater, Dryer (F1), and Drying Oven	none	N	<100	NA	100	N	N

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) Pursuant to 326 IAC 2-1.1-4 (Federal Provisions), in case of a conflict between the state rules and a provision of federal law or regulation, the more stringent requirement applies.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
 This existing minor PSD stationary source was initially constructed in 1978 after the applicability date of August 7, 1977, and it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1). This modification to the existing minor PSD stationary source will not change the PSD minor status, because the emissions from the entire source will continue to be limited to less than the PSD major source threshold levels (see Permit Level Determination - PSD and Emission Offset section above). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

Surface Coating Operations

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

- (1) The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 246 tons per 12 consecutive month period with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit, combined with the potential VOC emissions from all other emission units at this source, shall limit the source-wide total potential to emit VOC to less than 250 tons per 12 consecutive month period and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (2) The PM and PM10 emissions from each of the woodworking operations shall not exceed the emission limits listed in the table below:

Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
DC-01	6.77	6.77
DC-02	2.14	2.14
DC-04	4.03	4.03
DC-05	4.03	4.03
DC-06	8.31	8.31
DC-07	2.57	2.57

Compliance with these limits, combined with the potential PM and PM10 emissions from all other emission units at this source, shall limit the source-wide total potential to emit PM and PM10 to less than 250 tons per 12 consecutive month period, each, and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

In order to comply with these limits, each of the baghouses for particulate control shall be in operation and control emissions from each of the woodworking operations at all times that the woodworking operation is in operation.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

Pursuant to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source is not subject to 326 IAC 2-4.1-1, because the PTE of any single HAP and total HAPs is limited to less than 10 and 25 tons per year, respectively. Therefore, 326 IAC 2-4.1-1 does not apply. The source shall comply with the following:

- (a) The total input of each individual HAP from coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 9.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential HAP emissions from all other emission units at this source, shall limit the potential to emit each individual HAP to less than 10 tons per year from the entire source and render 40 CFR 63, Subpart JJ (Wood Furniture NESHAP) and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) not applicable.

- (b) The total input of any combination of HAPs from coatings, dilution solvents, and cleaning solvents, to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, shall not exceed 24.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential HAP emissions from all other emission units at this source, shall limit the potential to emit any combination of HAPs to less than 10 tons per year from the entire source and render 40 CFR 63, Subpart JJ (Wood Furniture NESHAP) and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) not applicable.

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

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c).

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

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

- (1) 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.

- (2) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

Surface Coating Operations

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-1(b)(6) and 326 IAC 6-3-1(b)(7), the wood curtain coater, the veneer wrappers, the panel laminators, the ink coater, and emission unit FE-4 are each exempt from the requirements of 326 IAC 6-3, because they each either utilize roll coating or flow coating application methods. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of these surface coating units is exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (2) Pursuant to 326 IAC 6-3-1(b)(14), emission unit FE-7 is exempt from the requirements of 326 IAC 6-3, because it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (3) Pursuant to 326 IAC 6-3-2(d), particulate emissions from emission units FE-1, FE-5 and FE-8 shall each be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Since FE-1 and FE-8 each use dry filters to control particulate overspray, they are each in compliance with 326 IAC 6-3-2. Emission unit FE-5 uses HVLP vacuum coating application with overspray recycled internally into the coating reservoir, which would be considered an equivalent control device under 326 IAC 6-3-2(d). Therefore emission unit FE-5 is in compliance with with 326 IAC 6-3-2.

- (h) 326 IAC 8-2-10 (Flat wood panels; manufacturing operations)
This rule applies to facilities located in Elkhart County, existing as of July 1, 1990, and facilities located in any county, constructed after July 1, 1990, that perform surface finishing of flat wood panels, as defined by 326 IAC 8-2-10(a), and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

The requirements of 326 IAC 8-2-10 are not applicable to this source, since this source does not perform surface finishing of flat wood panels, as defined by 326 IAC 8-2-10(a). The curtain coater and ink coater are each used to coat and print on cut lumber and trim pieces, respectively. Each of the laminators apply adhesive onto panels and a vinyl or paper laminate overlay is rolled onto the panels. The veneer wrappers apply adhesive onto profiles or mouldings and a vinyl or paper laminate wrapping material is applied. Emission units FE-1, FE-4, FE-5, FE-7, and FE-8 apply surface coatings or laminates to wood trim, mouldings, framing material, and profiles.

- (i) 326 IAC 8-2-12 (Wood furniture and cabinet coating)
This rule applies to facilities located in Elkhart County, existing as of July 1, 1990, and facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material.

- (1) The veneer wrappers, the ink coater, and emission unit FE-7, are each not subject to the requirements 326 IAC 8-2-12, since they each have potential and actual emissions of less than fifteen (15) pounds of VOC per day before add-on controls. These units are not subject to any other rule under 326 IAC 8 (Article 8: Volatile Organic Compound Rules).
- (2) The wood curtain coater*, the panel laminators*, and emission units FE-1, FE-4, FE-5, and FE-8 are each subject to the requirements 326 IAC 8-2-12, since they each could potentially have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Each of the surface coating units are in compliance with 326 IAC 8-2-12, since the wood curtain coater uses non-atomizing flowcoating application, the panel laminators each use roll coating application, emission unit FE-1 uses air-assisted airless spray application, FE-4 uses non-atomizing flowcoating application, FE-5 uses HVLP vacuum coating application with overspray recycled internally, and FE-8 uses HVLP application.

*Note: In the Technical Support Document (TSD) for FESOP No. 039-11882-00178, the wood curtain coater and the panel laminators were previously determined not to be subject to the requirements 326 IAC 8-2-12, since the source did not surface coat "wood furnishings". However, IDEM has determined that the requirements 326 IAC 8-2-12 apply to the surface coating of both "wood furnishings" and "wood furniture components". Therefore, the wood curtain coater and the panel laminators are now subject to the requirements 326 IAC 8-2-12.

- (j) 326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)
The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source is not located in Lake, Porter, Clark, or Floyd County.

Woodworking Operations

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 The requirements of 326 IAC 6-3 are applicable to each of the woodworking operations. Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from each of the woodworking operations shall not exceed the following allowable emission rates:

Baghouse ID	Process Weight Rate (pounds/hour)	Process Weight Rate (tons/hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (pounds/hour)
DC-01	7821.34	3.91	10.22
DC-02	1500.00	0.75	3.38
DC-04	3910.67	1.96	6.43
DC-05	23374.61	11.69	21.29
DC-06	14141.6	7.07	15.20
DC-07	41426.88	20.71	31.24

In order to comply with the allowable rate of emission, each of the baghouses for particulate control shall be in operation and control emissions from each of the woodworking operations at all times that the woodworking operation is in operation. The allowable rate of emission was calculated as follows:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

Compliance with this allowable rate of emission, combined with the potential PM emissions from all other emission units at this source, shall also limit the source-wide total potential to emit PM to less than 250 tons per 12 consecutive month period and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Natural Gas Combustion

- (m) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
 The natural gas-fired heaters (H1 through H95), dryer (F1), and drying oven are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.
- (n) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 The natural gas-fired heaters (H1 through H95), dryer (F1), and drying oven are each exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired heaters (H1 through H95) and dryer (F1) are each exempt from the requirements of 326 IAC 6-3, since they each have potential particulate emissions less than five hundred fifty one thousandths (0.551) pound per hour.
- (o) 326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)
 Each of the natural gas-fired heaters (H1 through H95), dryer (F1), and drying oven are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance determination requirements of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Compliance Monitoring Requirements

(a) The compliance monitoring requirements applicable to emission units FE-1, FE-5 and FE-8 are as follows:

- (1) The Permittee shall perform weekly overspray observations, and daily and monthly inspections of the dry filters.

These monitoring conditions are necessary because the dry filters for the emission units FE-1, FE-5 and FE-8 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(b) The compliance monitoring requirements applicable to each of the woodworking operations are as follows:

- (1) The Permittee shall perform daily visible emission notations of each of the woodworking operations stack exhaust; and
- (2) The Permittee shall perform quarterly inspections of each of the baghouses.

These monitoring conditions are necessary because each of the baghouse must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and to render 326 IAC 2-2 (PSD) not applicable.

Testing Requirements

There are no testing requirements for the surface coating or woodworking operations.

Recordkeeping and Reporting Requirements

(a) The recordkeeping and reporting requirements applicable to the surface coating operations, including the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8 are as follows:

- (1) The Permittee shall maintain records VOC/HAP input and VOC/HAP shipped offsite and deducted from total reported VOC/HAP usage in order demonstrate compliance with the VOC/HAP input limits; and
- (2) The Permittee shall submit a quarterly summary of the VOC and HAP input.

- (b) For emission units FE-1, FE-5 and FE-8, the Permittee shall maintain records of weekly overspray observations, daily and monthly inspections
- (c) The recordkeeping and reporting requirements applicable to each of the woodworking operations are as follows:
 - (1) The Permittee shall maintain records of daily visible emission notations of each of the woodworking operations stack exhaust; and
 - (2) The Permittee shall maintain records of each of the baghouse inspections results.

Air Quality Impacts from Minor Sources

Modeling Overview

Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has conducted a modeling analysis of the Limited Potential to Emit (PTE) criteria pollutants (after enforceable controls) from the proposed new emission units (EU-02, FE-1, FE-4, FE-5, FE-7, FE-8, woodworking operations controlled by Baghouse DC-06, and the saw dust conveying system controlled by Baghouse DC-07) to estimate whether the emissions would cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

Modeling Results – Criteria Pollutants

- (a) The modeling results indicate that the Limited PTE of all criteria pollutants from the proposed new emission units, except PM10 emissions from Baghouse DC-06, will not cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).
- (b) Based on Robert Weed Plywood Corporation's initial design for Baghouse DC-06 to exhaust to the outdoors, the modeling results indicate that, without additional measures, the PM10 emissions could potentially result in ground level PM10 concentrations that violate both the annual and 24 hour NAAQS for PM10. IDEM, OAQ and Robert Weed Plywood Corporation have mutually agreed to the following enforceable permit condition to avoid potential violations of the NAAQS for PM10 emissions from Baghouse DC-06:

Pursuant to 326 IAC 2-1.1-5 (Air Quality Requirements) and in order to ensure compliance with the National Ambient Air Quality Standards (NAAQS) for PM10, Baghouse DC-06 shall exhaust to the indoors at all times that the Building 14N Woodworking Operations B are in operation.

Conclusion and Recommendation

- (a) The construction of this proposed modification and the operation of the entire source shall be subject to the conditions of the attached proposed New Source Review and Part 70 Permit No. 039-25383-00178.
- (b) Unless otherwise stated, information used in this review was derived from the applications received by the Office of Air Quality (OAQ) on June 18, 2007 and September 28, 2007. Additional information was received on August 6, 2007, August 7, 2007, August 16, 2007, and September, 17, 2007.
- (c) Based on the facts, conditions, and evaluations made, the OAQ staff recommends to the IDEM's Commissioner that the New Source Review and Part 70 Permit No. 039-25383-00178 be approved.
- (d) Copies of the preliminary findings have been provided to the Bristol Washington Township Public Library.

IDEM Contact

Questions regarding this proposed permit can be directed to Mr. Nathan Bell at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, IN 46204-2251 or by telephone at 317-234-5372 or toll free at 1-800-451-6027 ext. 4-5372.

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
NSR and Part 70 Operating Permit No.: 039-25383-00178
Reviewer: Nathan C. Bell**

Process Description	Uncontrolled/Unlimited Potential to Emit (tons/year)								
	PM	PM10	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Curtain Coater	0	0			7.86		4.22E-03	4.22E-03	(xylenes)
Panel Laminators (Lam-1 through Lam-4)	0	0			33.05		1.8E-03	1.5E-03	(acetaldehyde)
Spray 1 Staining System (FE-1)	30.20	30.20			110.72		174.50	98.98	(methanol)
Fancoater Coating System (FE-4)	0	0			92.56		30.45	19.27	(xylenes)
Paint-O-Matic Coating System (FE-5)	2.72	2.72			11.01		0.55	0.55	(glycol ethers)
Spray 2 Staining System (FE-8)	13.07	13.07			93.74		25.27	19.21	(toluene)
Cleaning Solvents	0	0			40.12		2.79	1.15	(trichloroethylene)
Ink Coater	0	0			1.42		2.5E-03	2.4E-03	(xylenes)
Vaneer Wrappers	0	0			7.1E-04		0	0	---
Giardina Coating System (FE-7)	2.04	2.04			0		0.02	0.02	(formaldehyde)
Woodworking Operation	122014.3	122014.3							---
Heaters and Dryers	0.14	0.55	0.04	7.26	0.40	6.10	0.14	0.13	(hexane)
Total	122062.5	122062.9	0.04	7.26	390.87	6.10	233.70	98.98	(methanol)

Process Description	Controlled/Limited Potential to Emit (tons/year)								
	PM	PM10	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Curtain Coater	0	0							
Panel Laminators (Lam-1 through Lam-4)	0	0							
Spray 1 Staining System (FE-1)	0.60	0.60			Less Than 246.0		Less Than 24.0	Less Than 9.4	
Fancoater Coating System (FE-4)	0	0							
Paint-O-Matic Coating System (FE-5)	0.54	0.54							
Spray 2 Staining System (FE-8)	0.26	0.26							
Cleaning Solvents	0	0							
Ink Coater	0	0			1.42		2.5E-03	2.4E-03	(xylenes)
Vaneer Wrappers	0	0			7.1E-04		0	0	---
Giardina Coating System (FE-7)	0.41	0.41			0		0.02	0.02	(formaldehyde)
Woodworking Operation	Less Than 122.0	Less Than 122.0							---
Heaters and Dryers	0.14	0.55	0.04	7.26	0.40	6.10	0.14	0.13	(hexane)
Total	Less Than 124.0	Less Than 124.4	0.04	7.26	Less Than 247.8	6.10	Less Than 24.15	Less Than 9.55	

**Appendix A: Emissions Calculations
Volatile Organic Comounds (VOC) and Particulate Matter (PM)
Ink Coater, Curtain Coater, Vaneer Wrappers, and Panel Laminators**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
NSR and Part 70 Operating Permit No.: 039-25383-00178
Reviewer: Nathan C. Bell**

Unrestricted Potential to Emit

Operation and Material*	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	Actual VOC* (lb/day)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10 (lb/hr)	PTE PM/PM10 (tons/yr)	lb VOC per gal solids	Transfer Efficiency**											
One (1) Curtain Coater																																
WaterBase 652 (all colors) Worse Case (652-W5M-171)	11.87	42.47%	40.20%	57.53%	2.27%	60.94%	39.03%	5.50	1.0	132.00	65.29	0.69	0.27	1.48	11.86	35.57	6.49	0	0	0.69	100%											
White Ex. Primer/Basecoat (654-W5M-087C)	12.16	51.30%	49.82%	48.70%	1.48%	73.00%	25.00%	5.50	1.0	132.00	66.88	0.67	0.18	0.99	7.92	23.76	4.34	0	0	0.72	100%											
Gray Basecoat (625-ES-198)	11.76	43.14%	40.84%	56.86%	2.30%	60.94%	39.00%	5.50	1.0	132.00	64.68	0.69	0.27	1.49	11.90	35.70	6.52	0	0	0.69	100%											
PTE of Worst Case Base Coat =												0.69	0.27	1.49	11.90	35.70	6.52	0	0	0.72												
Butyl Cellosolve (2-Butoxyethanol) (23400)	7.50	100%	0%	0%	100%	0%	0%	0.028	1.0	0.67	0.21	7.50	7.50	0.21	1.68	5.04	0.92	0	0	NA	100%											
Thompson's Water Seal	6.79	70.54%	0%	29.46%	70.54%	73.00%	27.00%	0.020	1.0	0.48	0.14	17.74	4.79	0.10	0.77	2.30	0.42	0	0	17.74	100%											
Total for Curtain Coater =												1.79	14.35	43.04	7.86	0	0															
One (1) Ink Coater																																
Graining Ink (932-D5-6513)	8.89	58.49%	0%	41.51%	58.49%	0%	26.66%	0.018	1.0	0.43	0.16	5.20	5.20	0.09	0.75	2.25	0.41	0	0	19.50	100%											
Clear Ink Extender (932-C5-6512)	8.13	76.76%	0%	23.24%	76.76%	0%	13.20%	0.037	1.0	0.89	0.30	6.24	6.24	0.23	1.85	5.54	1.01	0	0	47.28	100%											
Ink Paste (worst case) (932-B5-6594, 6595, 6596, 6597)	9.00	30.89%	0%	69.11%	30.89%	0.00%	58.60%	0.0002	1.0	4.8E-03	1.8E-03	2.78	2.78	5.6E-04	4.4E-03	1.3E-02	2.4E-03	0	0	4.74	100%											
Total for Ink Coater =												0.33	2.60	7.80	1.42	0	0															
Nine (9) Vaneer Wrappers																																
Nat'l Starch Glue for Wrapping VY-LOK (40-1105)	9.00	36.00%	35.90%	64.00%	0.10%	38.00%	62.00%	0.018	1.0	0.43	0.16	0.01	0.01	1.6E-04	1.3E-03	3.9E-03	7.1E-04	0	0	0.01	100%											
Each Panel Laminator																																
A.I.T. Epoxy Glue (2271-A)	12.91	0%	0%	100%	0%	0%	100.00%	0.006	1.0	0.14	0.08	0	0	0	0	0	0	0	0	0.00	100%											
A.I.T. Epoxy Glue (2271-B)	10.41	0%	0%	100%	0%	0%	100.00%	0.006	1.0	0.14	0.06	0	0	0	0	0	0	0	0	0.00	100%											
Bayer Crosslink (7063)	9.66	0%	0%	100%	0%	0%	100.00%	3.12	1.0	74.88	30.14	0	0	0	0	0	0	0	0	0.00	100%											
Daubert Epoxy (X6496-A)	11.43	0.20%	0%	99.80%	0.20%	0%	95.00%	4.50	1.0	108.00	51.44	0.02	0.02	0.10	0.82	2.47	0.45	0	0	0.02	100%											
Daubert Epoxy (X6496-B)	9.66	0.20%	0%	99.80%	0.20%	0%	95.00%	4.50	1.0	108.00	43.47	0.02	0.02	0.09	0.70	2.09	0.38	0	0	0.02	100%											
HB Fuller Epoxy (Vinyl Lam Adhesive) (RK3489)	8.80	0.06%	0%	99.94%	0.06%	0%	99.00%	0.006	1.0	0.14	0.05	5.3E-03	5.3E-03	3.2E-05	2.5E-04	7.6E-04	1.4E-04	0	0	0.01	100%											
HB Fuller Tinted Lam. Adhesive (RK2463)	9.90	0.42%	0.35%	99.58%	0.07%	0.41%	99.00%	0.006	1.0	0.14	0.06	7.0E-03	6.9E-03	4.2E-05	3.3E-04	1.0E-03	1.8E-04	0	0	0.01	100%											
IFS Paper Lam. Adhesive (G-2556)	9.00	0.32%	0%	99.68%	0.32%	0%	99.00%	0.006	1.0	0.14	0.05	0.03	0.03	1.7E-04	1.4E-03	4.1E-03	7.6E-04	0	0	0.03	100%											
Nat'l Casein Laminate (PVC-E MV)	8.80	41.00%	40.27%	59.00%	0.73%	50.77%	48.00%	13.33	1.0	319.99	117.33	0.13	0.06	0.86	6.85	20.56	3.75	0	0	0.13	100%											
Nat'l Casein Lam Adhesive (PVC-E914)	9.40	41.00%	40.33%	59.00%	0.67%	46.27%	53.00%	13.33	1.0	319.99	125.33	1.2E-01	6.3E-02	0.84	6.72	20.15	3.68	0	0	0.12	100%											
Dural Paper Laminate Adhesive (G-2556)	9.00	55.00%	55.00%	45.00%	0%	59.40%	40.60%	7.33	1.0	175.99	66.00	0	0	0	0	0	0	0	0	0.00	100%											
PTE of Laminator Lam-1 =												0.33	0.21	1.89	15.09	45.27	8.26	0	0	0.34												
PTE of Laminator Lam-2 =												0.33	0.21	1.89	15.09	45.27	8.26	0	0	0.34												
PTE of Laminator Lam-3 =												0.33	0.21	1.89	15.09	45.27	8.26	0	0	0.34												
PTE of Laminator Lam-4 =												0.33	0.21	1.89	15.09	45.27	8.26	0	0	0.34												

METHODOLOGY

*Actual Emissions based on 8 hours per day

**The curtain coater uses a non-atomizing flowcoating system with no control. The ink coater, vaneer wrappers, and panel laminators each use roll coating with no control. Due to the type of equipment being used, one (1) unit equals one (1) gallon of material being applied.

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]

Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hours/day]

Pounds of VOC per Gallon Coating less Water and non-VOCs = [Density (lb/gal)] * [Weight % VOCs] / [1 - (Volume % water and non-VOCs)]

Pounds of VOC per Gallon Coating = [Density (lb/gal)] * [Weight % VOCs]

PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOCs]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]

PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]

PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency] * [365 days/yr] * [1 ton/2000 lbs]

Pounds VOC per Gallon of Solids = [Density (lbs/gal)] * [Weight % VOCs] / [Volume % solids]

Controlled PTE = [Uncontrolled PTE] * [1 - Control Efficiency]

Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/hour)] * [Actual Hours of Operation (hours/day)]

Totals (Uncontrolled)												9.66	77.31	231.93	42.33	0	0															
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**Appendix A: Emissions Calculations
 Hazardous Air Pollutants (HAPs)
 Ink Coater, Curtain Coater, Vaneer Wrappers, and Panel Laminators**

**Company Name: Robert Weed Plywood Corporation
 Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
 NSR and Part 70 Operating Permit No.: 039-25383-00178
 Reviewer: Nathan C. Bell**

Unrestricted Potential to Emit

Operation and Material*	Maximum Usage (lbs/hr)	Weight % Xylenes	Weight % Mn Compounds	Weight % Acetaldehyde	Weight % HCOH	Weight % Toluene	PTE of Xylenes (tons/yr)	PTE of Mn Compounds (tons/yr)	PTE of Acetaldehyde (tons/yr)	PTE of HCOH (tons/yr)	PTE of Toluene (tons/yr)
One (1) Curtain Coater											
WaterBase 652 (all colors) Worse Case (652-W5M-171)**	65.29	0%	0%	0%	0%	0%	0	0	0	0	0
White Ex. Primer/Basecoat (654-W5M-087C)**	66.88	0%	0%	0%	0%	0%	0	0	0	0	0
Gray Basecoat (625-ES-198)**	64.68	0%	0%	0%	0%	0%	0	0	0	0	0
PTE of Worst Case Base Coat =							0	0	0	0	0
Butyl Cellosolve (2-Butoxyethanol) (23400)**	0.21	0%	0%	0%	0%	0%	0	0	0	0	0
Thompson's Water Seal***, ****	0.14	0.71%	0%	0%	0%	0%	4.22E-03	0	0	0	0
Total for Curtain Coater =							4.2E-03	0	0	0	0
One (1) Ink Coater											
Graining Ink (932-D5-6513)*****	0.16	0.30%	0%	0%	0%	0%	2.10E-03	0	0	0	0
Clear Ink Extender (932-C5-6512)	0.30	0%	0%	0%	0%	0%	0	0	0	0	0
Ink Paste (worst case) (932-B5-6594, 6595, 6596, 6597)****	1.8E-03	3.55%	1.90%	0%	0%	0%	2.8E-04	1.5E-04	0	0	0
Total for Ink Coater =							2.4E-03	1.5E-04	0	0	0
Nine (9) Vaneer Wrappers											
Nat'l Starch Glue for Wrapping VY-LOK (40-1105)	0.16	0%	0%	0%	0%	0%	0	0	0	0	0
Each Panel Laminator											
A.I.T. Epoxy Glue (2271-A)	0.08	0%	0%	0%	0%	0%	0	0	0	0	0
A.I.T. Epoxy Glue (2271-B)	0.06	0%	0%	0%	0%	0%	0	0	0	0	0
Bayer Crosslink (7063)	30.14	0%	0%	0%	0%	0%	0	0	0	0	0
Daubert Epoxy (X6496-A)	51.44	0%	0%	0%	0%	0%	0	0	0	0	0
Daubert Epoxy (X6496-B)	43.47	0%	0%	0%	0%	0%	0	0	0	0	0
HB Fuller Epoxy (Vinyl Lam Adhesive) (RK3489)	0.05	0%	0%	0.0854%	0.0170%	0.0041%	0	0	2.0E-04	3.9E-05	9.5E-06
HB Fuller Tinted Lam. Adhesive (RK2463)	0.06	0%	0%	0.0635%	0.0127%	0.0029%	0	0	1.7E-04	3.3E-05	7.5E-06
IFS Paper Lam. Adhesive (G-2556)	0.05	0%	0%	0%	0%	0%	0	0	0	0	0
Nat'l Casein Laminate (PVC-E MV)	117.33	0%	0%	0%	0%	0%	0	0	0	0	0
Nat'l Casein Lam Adhesive (PVC-E914)	125.33	0%	0%	0%	0%	0%	0	0	0	0	0
Dural Paper Laminate Adhesive (G-2556)	66.00	0%	0%	0%	0%	0%	0	0	0	0	0
PTE of Laminator Lam-1 =							0	0	3.6E-04	7.2E-05	1.7E-05
PTE of Laminator Lam-2 =							0	0	3.6E-04	7.2E-05	1.7E-05
PTE of Laminator Lam-3 =							0	0	3.6E-04	7.2E-05	1.7E-05
PTE of Laminator Lam-4 =							0	0	3.6E-04	7.2E-05	1.7E-05

ACRONYMS

Mn = Manganese
 HCOH = Formaldehyde

PTE of Single HAPs (tons/yr)	6.6E-03	1.5E-04	1.5E-03	2.9E-04	6.8E-05
PTE of Total HAPs (tons/yr)	0.01				

METHODOLOGY

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

* All materials "as supplied" (same as "as applied" for these materials).

** Coating contains ethylene glycol monobutyl ether (2-Butoxy ethanol or Butyl Cellosolve) (CAS # 111-76-2), which has been delisted from the list of hazardous air pollutants under 326 IAC 1-2-33.5.

*** Coating Contains medium aliphatic hydrocarbon solvent or mineral spirits (CAS #64742-88-7). Pursuant to 40 CFR 63, chemicals under CAS #64742-88-7 contain 1% by weight Xylene.

**** Coating Contains light aromatic hydrocarbons (CAS #64742-95-6). Pursuant to 40 CFR 63, chemicals under CAS #64742-95-6 contain 5% by weight Xylene.

***** Coating Contains petroleum hydrocarbon and mineral spirits (CAS #8052-41-3). Pursuant to 40 CFR 63, chemicals under CAS #8052-41-3 contain 1% by weight Xylene.

**Appendix A: Emissions Calculations
Volatile Organic Compounds (VOC) and Particulate Matter (PM)
EU-02 Surface Coating Operations**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
NSR and Part 70 Operating Permit No.: 039-25383-00178
Reviewer: Nathan C. Bell**

Unrestricted Potential to Emit

Operation and Material*	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	Actual VOC** (lb/day)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10 (lb/hr)	PTE PM/PM10 (tons/yr)	PTE PM/PM10 After Control (tons/yr)	lb VOC per gal solids	Transfer Efficiency***	Overspray Control Efficiency***
One (1) Spray 1 Solvent-Based Staining System (FE-1)																							
WS3133	7.04	99.74%	0.00%	0.26%	99.74%	0.00%	0.15%	0.002	1800.0	86.40	25.34	7.02	7.02	25.28	202.2	606.7	110.7	0.033	0.14	0.003	4712.5	50%	98%
Super White II	7.58	49.47%	3.87%	50.53%	45.60%	3.87%	22.33%	0.002	1800.0	86.40	27.29	3.60	3.46	12.44	99.6	298.7	54.5	6.89	30.20	0.60	15.5	50%	98%
WS3144	7.91	84.99%	5.11%	15.01%	79.88%	2.49%	7.25%	0.002	1800.0	86.40	28.48	6.48	6.32	22.75	182.0	545.9	99.6	2.14	9.36	0.19	87.2	50%	98%
WS3254	6.75	95.27%	0.00%	4.73%	95.27%	0.00%	3.64%	0.002	1800.0	86.40	24.30	6.43	6.43	23.15	185.2	555.6	101.4	0.58	2.52	0.05	176.6	50%	98%
PTE of Worst Case Stain =												7.02	7.02	25.28	202.2	606.7	110.7	6.89	30.20	0.604	4712.5		
One (1) Fancoater Solvent-Based Coating System (FE-4)																							
Special Lacquer	7.50	76.77%	0.00%	23.23%	76.77%	0.00%	16.75%	0.002	1800.0	86.40	27.00	5.76	5.76	20.73	165.8	497.5	90.8	0	0	0	34.4	100%	NA
Poly Solve EB	7.51	100.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.000	1800.0	1.30	0.41	7.51	0.41	3.24	9.73	1.78	0	0	0	0	NA	100%	NA
Total for Fancoater FE-4 =												21.13	169.1	507.2	92.6	0	0	0					
One (1) Paint-O-Matic Water-Based Coating System (FE-5)																							
Waterbase Stain 169	9.09	78.62%	70.22%	21.38%	8.40%	75.24%	15.38%	0.001	3200.0	76.80	29.09	3.08	0.76	2.44	19.54	58.61	10.70	0.62	2.72	0.54	5.0	90%	80%
Old WS-2006	8.67	90.09%	81.03%	9.91%	9.06%	82.82%	7.20%	0.001	3200.0	76.80	27.74	4.57	0.79	2.51	20.12	60.35	11.01	0.27	1.20	0.24	10.9	90%	80%
PTE of Worst Case Coating =												4.57	0.79	2.51	20.1	60.3	11.0	0.62	2.72	0.54	10.9		
One (1) Giardina Water-Based Coating System (FE-7)																							
437-5010	9.33	0.00%	0.00%	100.00%	0.00%	0.00%	1.00%	0.001	2500.0	60.00	23.33	0	0	0	0	0	0	0.47	2.04	0.41	0	98%	80%
One (1) Spray 2 Water-Based Staining System (FE-8)																							
Lacquer	7.41	70.18%	6.00%	29.82%	64.18%	6.00%	22.96%	0.003	1500.0	108.00	33.35	5.06	4.76	21.40	171.2	513.6	93.7	2.98	13.07	0.26	20.7	70%	98%
Cleaning Solvents																							
Trichloroethylene (TCE)	12.20	100.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.000	5000.0	0.52	0.26	12.2	12.2	0.26	2.10	6.30	1.15	0	0	0	NA	100%	NA
S-0105	6.59	100.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.000	5000.0	32.40	8.90	6.59	6.59	8.90	71.17	213.52	38.97	0	0	0	NA	100%	NA
Total for Cleaning Solvents =												9.16	73.3	219.8	40.1	0	0	0					

METHODOLOGY

*All materials "as supplied".

**Actual Emissions based on 8 hours per day

***Details for each of the surface coating systems are as follows:

FE-1 uses HVLP spray guns and dry filters with 98% overspray control efficiency

FE-4 uses a non-atomizing flowcoating system with no control

FE-5 and FE-7 use vacuum coating application assuming 80% of coating overspray is recycled internally

FE-8 uses air assisted airless application and dry filters with 98% overspray control efficiency

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]

Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hour/day]

Pounds of VOC per Gallon Coating less Water and non-VOCs = [Density (lb/gal)] * [Weight % VOCs] / [1 - (Volume % water and non-VOCs)]

Pounds of VOC per Gallon Coating = [Density (lb/gal)] * [Weight % VOCs]

PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOCs]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]

PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]

PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency]] * [365 days/yr] * [1 ton/2000 lbs]

Pounds VOC per Gallon of Solids = [Density (lbs/gal)] * [Weight % VOCs] / [Volume % solids]

Controlled PTE = [Uncontrolled PTE] * [1 - Control Efficiency]

Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/hour)] * [Actual Hours of Operation (hours/day)]

Total = Worst Case Coatings + Sum of all solvents used

Totals	1907.6	348.1	11.0	48.0	1.82
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**Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs)
EU-02 Surface Coating Operations**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
NSR and Part 70 Operating Permit No.: 039-25383-00178
Reviewer: Nathan C. Bell**

Unrestricted Potential to Emit

Operation and Material*	Maximum Usage (lbs/hr)	Weight % TCE	Weight % Toluene	Weight % Xylene	Weight % MIBK	Weight % Methanol	Weight % GE	Weight % HCOH	PTE of TCE (tons/yr)	PTE of Toluene (tons/yr)	PTE of Xylene (tons/yr)	PTE of MIBK (tons/yr)	PTE of Methanol (tons/yr)	PTE of GE (tons/yr)	PTE of HCOH (tons/yr)
One (1) Spray 1 Solvent-Based Staining System (FE-1)															
WS3133***	25.34	0%	0.63%	0.63%	0%	0%	0%	0%	0	0.70	0.70	0	0	0	0
Super White II****	27.29	0%	17.97%	3.46%	3.87%	0%	0%	0%	0	21	4.13	4.63	0	0	0
WS3144	28.48	0%	49.62%	0%	7.61%	7.55%	0%	0%	0	61.89	0	9.49	9	0	0
WS3254	24.30	0%	0%	0%	0%	93.0%	0%	0%	0	0	0	0	98.98	0	0
PTE of Worst Case Stain =									0	61.89	4.13	9.49	98.98	0	0
One (1) Fancoater Solvent-Based Coating System (FE-4)															
Special Lacquer**,***,*****	27.00	0%	9.45%	16.30%	0%	0%	0%	0%	0	11.17	19.27	0	0	0.00	0
Poly Solve EB**	0.41	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0.00	0
Total for Fancoater FE-4 =									0	11.17	19.27	0	0	0	0
One (1) Paint-O-Matic Water-Based Coating System (FE-5)															
Waterbase Stain 169**	29.09	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Old WS-2006**	27.74	0%	0%	0%	0%	0%	0.45%	0%	0	0	0	0	0	0.55	0
PTE of Worst Case Coating =									0	0	0	0	0	0.55	0
One (1) Giardina Water-Based Coating System (FE-7)															
437-5010	23.33	0%	0%	0%	0%	0%	0%	0.015%	0	0	0	0	0	0	0.02
One (1) Spray 2 Water-Based Staining System (FE-8)															
Lacquer**,***	33.35	0%	13.15%	0.15%	4.0%	0%	0%	0%	0	19.21	0.22	5.84	0	0.00	0
Cleaning Solvents															
Trichloroethylene (TCE)	0.26	100.0%	0%	0%	0%	0%	0%	0%	1.15	0	0	0	0	0	0
Solvent Blend S-0105***	8.90	0%	2.10%	2.10%	0%	0%	0%	0%	0	0.82	0.82	0	0	0	0
Total for Cleaning Solvents =									1.15	0.82	0.82	0.00	0.00	0.00	0.00

ACRONYMS

BEHP = Bis(2-ethyl-hexyl) phthalate MIBK - Methyl Isobutyl Ketone
TCE = Trichloroethylene GE = Glycol Ethers
MEK = Methyl Ethyl Ketone HCOH = Formaldehyde

PTE of Single HAPs (tons/yr)	1.15	93.09	24.44	15.33	98.98	0.55	0.02
PTE of Total HAPs (tons/yr)	233.56						

METHODOLOGY

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

* All materials "as supplied" (same as "as applied" for these materials).

** Coating contains ethylene glycol monobutyl ether (2-Butoxy ethanol) (CAS # 111-76-2), which has been delisted from the list of hazardous air pollutants under 326 IAC 1-2-33.5.

*** Coating Contains naptha (CAS #64742-89-8). Pursuant to 40 CFR 63, chemicals under CAS #64742-89-8 contain 3% by weight Toluene and 3% by weight Xylene.

**** Coating Contains mineral spirits (CAS #64742-88-7). Pursuant to 40 CFR 63, chemicals under CAS #64742-88-7 contain 1% by weight Xylene.

***** Coating Contains aromatic naptha (CAS #64742-95-6). Pursuant to 40 CFR 63, chemicals under CAS #64742-95-6 contain 5% by weight Xylene.

**Appendix A: Emission Calculations
Woodworking Operations**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
NSR and Part 70 Operating Permit No.: 039-25383-00178
Reviewer: Nathan C. Bell**

Potential to Emit (PTE) PM and PM10

Baghouse ID	Baghouse Outlet Grain Loading (grains/acf)	Baghouse Outlet Air Flow Rate (acfm)	PTE of PM/PM10 After Controls (lbs/hr)	PTE of PM/PM10 After Controls (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 Before Controls (lbs/hr)	PTE of PM/PM10 Before Controls (tons/yr)
DC-01	0.0200	39500	6.77	29.66	99.9%	6771.4	29658.9
DC-02	0.0200	12500	2.14	9.39	99.9%	2142.9	9385.7
DC-04	0.0200	23500	4.03	17.65	99.9%	4028.57	17645.1
DC-05	0.0200	23500	4.03	17.65	99.9%	4028.6	17645.1
DC-06	0.0200	48500	8.31	36.42	99.9%	8314.3	36416.6
DC-07*	0.0200	15000	2.57	11.26	99.9%	2571.4	11262.9
Total			27.86	122.01		27857.1	122014.3

Limited Potential to Emit (PTE) PM

Baghouse ID	Limited PTE of PM (lbs/hr)	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (lbs/hr)	Limited PTE of PM10 (tons/yr)
DC-01	6.77	29.66	6.77	29.66
DC-02	2.14	9.39	2.14	9.39
DC-04	4.03	17.65	4.03	17.65
DC-05	4.03	17.65	4.03	17.65
DC-06	8.31	36.42	8.31	36.42
DC-07*	2.57	11.26	2.57	11.26
	27.86	122.01	27.86	122.01

326 IAC 6-3-2 Allowable PM Emission Rate

Baghouse ID	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	PTE of PM After Controls (lbs/hr)
DC-01	7821.34	3.91	10.22	6.77
DC-02	1500.00	0.75	3.38	2.14
DC-04	3910.67	1.96	6.43	4.03
DC-05	23374.61	11.69	21.29	4.03
DC-06	14141.6	7.07	15.20	8.31
DC-07*	41426.88	20.71	31.24	8.31

Since Baghouse DC-07 controls the saw dust that is pneumatically conveyed from Baghouses DC-04, DC-05, and DC-06 to the sawdust storage silo, the process weight rate is determined by summing the process weight rates for Baghouses DC-04, DC-05, and DC-06.

METHODOLOGY

Potential to Emit PM/PM10 After Controls (lbs/hr) = [Baghouse Outlet Grain Loading (grains/acf)] * [Baghouse Outlet Air Flow Rate (acfm)] * [60 min/hr] * [lbs/7000 grains]
 Potential to Emit PM/PM10 After Controls (tons/yr) = [Potential to Emit PM/PM10 After Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

Potential to Emit PM/PM10 Before Controls (lbs/hr) = [Potential to Emit PM/PM10 After Controls (lbs/hr)] / (1 - control efficiency)
 Potential to Emit PM/PM10 Before Controls (tons/yr) = [Potential to Emit PM/PM10 Before Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
 PM = Particulate Matter, PM-10 = Particulate Matter less than 10 micrometers, PTE = Potential to Emit

326 IAC 6-3-2 Allowable PM Emission Rate = 4.10 * [Process Weight Rate (tons/hr)]^{0.67}

**Appendix A: Emissions Calculations
Air Make-Up Units and Process Heaters
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
NSR and Part 70 Operating Permit No.: 039-25383-00178
Reviewer: Nathan C. Bell**

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr					
					PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMCF)					1.9	7.6	0.6	100	5.5	84.0
Infrared Heaters (H1 - H95)	95	0.125	11.875	104.03	9.9E-02	0.395	3.1E-02	5.201	0.286	4.369
Dryer (F-1)	1	1.200	1.200	10.51	1.0E-02	0.040	3.2E-03	0.526	0.029	0.442
Drying Oven for EU-02	1	3.500	3.500	30.66	2.9E-02	0.117	9.2E-03	1.533	0.084	1.288
Totals	97		16.58		0.138	0.552	0.044	7.260	0.399	6.098

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Emission Unit	Potential Emission tons/yr									
Infrared Heaters (H1 - H95)	1.1E-04	6.2E-05	3.9E-03	9.4E-02	1.8E-04	2.6E-05	5.7E-05	7.3E-05	2.0E-05	1.1E-04
Dryer (F-1)	1.1E-05	6.3E-06	3.9E-04	9.5E-03	1.8E-05	2.6E-06	5.8E-06	7.4E-06	2.0E-06	1.1E-05
Drying Oven for EU-02	3.2E-05	1.8E-05	1.1E-03	2.8E-02	5.2E-05	7.7E-06	1.7E-05	2.1E-05	5.8E-06	3.2E-05
Totals	1.5E-04	8.7E-05	5.4E-03	0.131	2.5E-04	3.6E-05	8.0E-05	1.0E-04	2.8E-05	1.5E-04

*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

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

Methodology

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

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

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)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter	NOx = Nitrous Oxides	DCB = Dichlorobenzene	Cr = Chromium
PM10 = Particulate Matter (<10 um)	VOC = Volatile Organic Compounds	Pb = Lead	Mn = Manganese
SO2 = Sulfur Dioxide	CO = Carbon Monoxide	Cd = Cadmium	Ni = Nickel