



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 12, 2008

RE: Pike Lumber Company / 049-26048-00007

FROM: Matthew Stuckey, 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 according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Governor

Thomas W. Easterly
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Larry Hunter
Pike Lumber Company, Inc.
P.O. Box 247
Akron, Indiana 46910

May 12, 2008

Re: 049-26048-00007
Second Significant Revision to
FESOP Renewal 049-23053-00007

Dear Mr. Hunter:

Pike Lumber Company, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal 049-23053-00007 on April 20, 2007 for the operation of a hardwood lumber sawing operation. A letter requesting changes to this permit was received on February 5, 2008. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the PM and PM10 emission limits from the Wood Planer (EU-20.3) and the Wood Fired Boiler (EU-2.1).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Bryan Lange, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7854 to speak directly to Mr. Lange. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Original signed by,

Alfred Dumauual, Ph.D, Section Chief
Permits Branch
Office of Air Quality

Attachments
ERG/BL

cc: File - Fulton County
U.S. EPA, Region V
Fulton County Health Department

IDEM - Northern Regional Office
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development
Technical Support and Modeling
Billing, Licensing and Training Section



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Pike Lumber Company, Inc.
719 Front Street
Akron, Indiana 46910

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F049-23053-00007	
Originally signed by: Nisha Sizemore Permits Branch Chief Office of Air Quality	Issuance Date: April 20, 2007 Expiration Date: April 20, 2017

First Significant Permit Revision No. 049-24814-00007 issued November 9, 2007

First Administrative Amendment No. 049-25652-00007 issued January 11, 2008

Second Significant Permit Revision No. 049-26048-00007	
Original signed by: Alfred Dumauval, Ph.D, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 12, 2008 Expiration Date: April 20, 2017

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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 2-8-3(b)]

The Permittee owns and operates a stationary hardwood lumber sawing operation.

Source Address:	719 Front Street, Akron, Indiana 46910
Mailing Address:	P.O. Box 247, Akron, Indiana 46910
General Source Phone Number:	(574) 893-4511
SIC Code:	2421
County Location:	Fulton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 2-8-3(c)(3)]

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

- (a) One (1) wood-fired boiler, identified as EU-2.1, constructed in 1988, with a maximum heat input capacity of 20.9 MMBtu/hr, equipped with a multiple-cyclone for particulate control, and exhausting to stack S-2.1.
- (b) One (1) natural gas-fired standby boiler, identified as EU-2.2, constructed in 1988, with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stack S-2.2.
- (c) Wood sawing operations, identified as EU-20.1.1, constructed in 1996, with a total throughput rate of 25.7 tons of wood per hour, controlled by a cyclone, and exhausting inside the building.
- (d) One (1) wood planer, identified as EU-20.3, constructed in 1986, with a maximum throughput rate of 9.7 tons of wood per hour, controlled by a cyclone, and exhausting to vent V 34.
- (e) One (1) wood storage silo, identified as EU-3.2, constructed in 1983, with a maximum throughput rate of 8.9 tons per hour, controlled by a cyclone.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months and are not subject to 326 IAC 20-6, constructed in 1983. [326 IAC 8-3-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300

gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

- (e) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
- (1) Two (2) diesel storage tanks, with maximum capacities of 14,500 and 15,000 gallons, respectively.
 - (2) One (1) dip tank for chemical treatment, using water based solutions.
 - (3) One (1) shaving bin (fuel bin) identified as EU-3.1, constructed in 1971.
 - (4) One (1) wood fuel pile.
 - (5) Drying kilns 1-35.
 - (6) One (1) predrying process.
 - (7) Woodworking operations, including the following: [326 IAC 6-3-2]
 - (A) One (1) debarker, with a maximum throughput rate of 2,000 pounds per hour.
 - (B) One (1) sawmill chipper, with a maximum throughput rate of 16,800 pounds per hour per hour, equipped with a cyclone, and exhausting to the fuel bin.
 - (C) Greenchain/trimmings and hog, with a maximum throughput rate of 1,600 pounds per hour, equipped with a cyclone dust collector.
 - (D) One (1) straight line rip saw, with a maximum throughput rate of 350 pounds per hour.
 - (E) One (1) bin sorter, constructed in 2003, with a maximum throughput rate of 3,550 pounds per hour, containing trim saws and one (1) wood grinder, controlled by baghouse EFR-86-10.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][[326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F049-23053-00007, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

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

B.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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;

IDEM

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

And

Northern Regional Office
Telephone Number: 574- 245-4870
Facsimile Number: 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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F049-23053-00007 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) Deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least 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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

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

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

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

by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.17 General Reporting Requirements [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

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

SECTION D.1 FACILITY OPERATION CONDITIONS – Boilers

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

- (a) One (1) wood-fired boiler, identified as EU-2.1, constructed in 1988, with a maximum heat input capacity of 20.9 MMBtu/hr, equipped with a multiple-cyclone for particulate control, and exhausting to stack S-2.1.
- (b) One (1) natural gas-fired standby boiler, identified as EU-2.2, constructed in 1988, with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stack S-2.2.

(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 2-8-4(1)]

D.1.1 PM and PM10 Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2(PSD) not applicable, the Permittee shall comply with the following:

- (a) The PM emissions from boiler EU-2.1 shall not exceed 6.27 lbs/hr.
- (b) The PM10 emissions from boiler EU-2.1 shall not exceed 5.64 lbs/hr.

Combined with the PM emissions from the natural gas fire boiler (EU-2.2), the woodworking operations, and the insignificant activities, the total emissions from the entire source are limited to less than 100 tons/yr for PM10 and less than 250 tons/yr for PM. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (PSD) are not applicable.

D.1.2 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each of boilers EU-2.1 and EU-2.2 shall be limited to 0.40 pounds per MMBtu heat input.

The limit was calculated using the following equation:

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

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 PM and PM10 Control

In order to comply with Condition D.1.1, the cyclone equipped with boiler EU-2.1 shall be in operation and control emissions from boiler EU-2.1 at all times that this unit is in operation.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM10 testing for boiler EU-2.1 within 180 days after issuance of this permit, utilizing

methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the stack exhaust from boiler stack S-2.1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of stack S-2.1. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS – Woodworking Operations

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

- (c) Wood sawing operations, identified as EU-20.1.1, constructed in 1996, with a total throughput rate of 25.7 tons of wood per hour, controlled by a cyclone, and exhausting inside the building.
- (d) One (1) wood planer, identified as EU-20.3, constructed in 1986, with a maximum throughput rate of 9.7 tons of wood per hour, controlled by a cyclone, and exhausting to vent V 34.
- (e) One (1) wood storage silo, identified as EU-3.2, constructed in 1983, with a maximum throughput rate of 8.9 tons per hour, controlled by a cyclone.

(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 2-8-4(1)]

D.2.1 PM and PM10 Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2(PSD) not applicable, the PM/PM10 emissions from the woodworking operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	1.80	1.03
EU-20.3	Wood Planer	10.1	9.44
EU-3.2	Storage Silo	1.78	1.03

Combined with the PM emissions from the boilers and the insignificant activities, the total emissions from the entire source are limited to less than 100 tons/yr for PM10 and less than 250 tons/yr for PM. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (PSD) are not applicable.

D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Maximum Process Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	25.7	36.1
EU-20.3	Wood Planer	9.70	18.8
EU-3.2	Storage Silo	8.90	17.7

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

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.2.4 PM and PM10 Control

In order to comply with Conditions D.2.1 and D.2.2, the cyclones associated with the sawing operations (EU-20.1.1), the wood planer (EU-20.3), and the storage silo (EU-3.2) shall be in operation and control emissions from the woodworking operations at all times that these units are in operation.

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform following tests:

- (a) PM and PM10 testing for the wood sawing operation (EU-20.1.1) and the storage silo (EU-3.2) within five (5) years from the date of the last valid compliance demonstration, utilizing methods as approved by the Commissioner.
- (b) PM and PM10 testing for the wood planer (EU-20.3) within five (5) years from the date of the last valid compliance demonstration, utilizing methods as approved by the Commissioner.

PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

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

D.2.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of exhausts from the cyclones. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS – Degreasing and Woodworking Operations

Facility Description [326 IAC 2-8-4(10)] : Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months and are not subject to 326 IAC 20-6, constructed in 1983. [326 IAC 8-3-2]
- (e) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
 - (7) Woodworking operations, including the following: [326 IAC 6-3-2]
 - (A) One (1) debarker, with a maximum throughput rate of 2,000 pounds per hour.
 - (B) One (1) sawmill chipper, with a maximum throughput rate of 16,800 pounds per hour per hour, equipped with a cyclone, and exhausting to the fuel bin.
 - (C) Greenchain/trimmings and hog, with a maximum throughput rate of 1,600 pounds per hour, equipped with a cyclone dust collector.
 - (D) One (1) straight line rip saw, with a maximum throughput rate of 350 pounds per hour.
 - (E) One (1) bin sorter, constructed in 2003, with a maximum throughput rate of 3,550 pounds per hour, containing trim saws and one (1) wood grinder, controlled by baghouse EFR-86-10.

(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 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the insignificant woodworking operations shall not exceed the pounds per hour limit listed in the table below:

Unit Description	Maximum Process Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
Debarker	2,000	4.10
Sawmill Chipper	16,800	17.1
Greenchain and Hog	1,600	3.53
Rip Saw	350	1.28
Bin Sorter	3,550	6.02

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

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP Permit No.: F049-23053-00007

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:

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP Permit No.: F049-23053-00007

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP Permit No.: F049-23053-00007

Months: _____ to _____ Year: _____

Page 1 of 2

<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 ΔNo 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 Significant Permit Revision to a Federal Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name:	Pike Lumber Company, Inc.
Source Location:	719 Front Street, Akron, Indiana 46910
County:	Fulton
SIC Code:	2421
Operation Permit No.:	F049-23053-00007
Operation Permit Issuance Date:	April 20, 2007
Significant Permit Revision No.:	049-26048-00007
Permit Reviewer:	ERG/BL

The OAQ has received an application from Pike Lumber Company, Inc. related to a modification to an existing hardwood lumber sawing operation.

Existing Approvals

The source was issued FESOP Renewal No. 049-23053-00007 on April 20, 2007. The source has since received the following approvals:

- (a) Significant Permit Revision No. 049-24814-00007, issued on November 9, 2007; and
- (b) Administrative Amendment No. 049-25652-00007, issued on January 11, 2008.

County Attainment Status

The source is located in Fulton County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) Ozone Standards
 - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
 - (2) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the

National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
 Fulton County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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.
- (c) **Other Criteria Pollutants**
 Fulton County has been classified as attainment or unclassifiable in Indiana for other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	69.0
PM10	18.5
SO ₂	2.35
VOC	3.15
CO	64.0
NO _x	55.7

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated 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, as specified in 326 IAC 2-2-1(gg)(1).
- (c) These emissions are based upon the potential to emit listed in the TSD for SPR No.: 049-24814-00007, issued November 9, 2007.

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

HAPs	Emissions (tons/year)
Acrolein	0.37
Benzene	0.38
Formaldehyde	0.40
HCl	1.74
Styrene	0.17
TOTAL	3.07

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs

emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a revision application, submitted by Pike Lumber Company, Inc. on February 5, 2008, relating to the revision of PM and PM10 emission limits from the Wood Planer (EU-20.3) and the Wood Fired Boiler (EU-2.1).

- (a) The Permittee requested to revise the PM/PM10 emission limit for the wood planer in Condition D.1.1 as follows:

Unit ID	Unit Description	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
EU-2.1	Wood-fired boiler	4.67 6.27	4.50 5.64

The wood-fired boiler at Pike Lumber Company, Inc. is equipped with a multiclone collector. The Permittee stated that the original PM/PM10 emission limits, listed in SPR No.: 049-24814-00007, condition D.1.1, were derived from uncontrolled PM/PM10 emission factor, from AP-42 Chapter 1.6 - Wood Residue Combustion in Boilers (September 2003 edition) and a control device collection efficiency of 80%. The Permittee has proposed to revise the PM and PM10 limit to reflect a cyclone collection efficiency of 25%.

- (b) The Permittee requested to revise the PM10 emission limit for the wood planer in Condition D.2.1 as follows:

Unit ID	Unit Description	PM10 Emission Limit (lbs/hr)
EU-20.3	Wood Planer	0.098 9.44

The Permittee stated that the original PM10 emission limits listed in SPR No.: 049-24814-00007, condition D.2.1, were based on the stack test results for this unit in 2004 plus a safety margin requested by the Permittee. A recent review of the stack test results showed a misinterpretation of the 2004 test results. The Permittee reported the condensable particulate emission rate as PM10 emissions.

With the revised PM/PM10 emission limits for the Wood Planer (EU-20.3) and the Wood Fired Boiler (EU-2.1), the potential to emit of the entire source remains limited to less than 100 tons per year for PM/PM10 (see Appendix A). Therefore, this source is able to maintain their FESOP and PSD minor status after revising the limits for the wood planer.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – FESOP Revision

There is no new construction associated with this revision. The FESOP Renewal is being modified through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(g)(2) as this revision requires an adjustment to the emission cap limitations.

Permit Level Determination – FESOP

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 this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Facility	Potential to Emit After Issuance (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Wood Fired Boiler	Less than 7.32 27.5	Less than 6.59 24.7	2.29	1.56	54.9	44.9	3.07
NG Fired Boiler	0.20	0.82	0.06	0.59	9.05	10.8	0.20
Woodworking Operations	Less than 59.9	Less than 9.46 50.4	-	-	-	-	-
Insignificant Woodworking Units	0.62	0.62	-	-	-	-	-
Other Insignificant Activities	Less than 1.0	Less than 1.0	-	Less than 1.0	-	-	Negligible
Total Emissions	Less than 69.0 89.1	Less than 48.5 77.5	2.35	3.15	64.0	55.7	3.27
Part 70 Program Thresholds	NA	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

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

After this revision, this source is still a minor source pursuant to the Part 70 Permit program.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed revision.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this proposed revision.

State Rule Applicability Determination

The following state rules are applicable to the source due to the revision:

326 IAC 2-2 (PSD)

The source was constructed in 1971 and modified in 1983, 1986, 1988, and 2003. The source is not in 1 of 28 source categories as defined in 326 IAC 2-2-1(gg)(1) and the potential to emit PM/PM10 from the entire source before control is greater than 250 tons per year.

This modification to an existing minor PSD stationary source will not change the PSD minor status because the emissions from the entire source will continue to be less than the PSD major source

threshold levels (see Potential to Emit After Revision for Entire Source Table above).

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

The operation of the Wood Planer (EU-20.3) and the Wood Fired Boiler (EU-2.1) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte Counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

The potential to emit PM10 before control of the entire source is greater than 100 tons per year. In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the emission limits have been revised as follows:

- (a) The wood-fired boiler EU-2.1 shall comply with the following limits (permit Condition D.1.1):

Unit ID	Unit Description	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
EU-2.1	Wood-fired boiler	6.27	5.64

- (b) The wood planer EU-20.3 shall comply with the following limits (permit Condition D.2.1):

Unit ID	Unit Description	PM10 Emission Limit (lbs/hr)
EU-20.3	Wood Planer	9.44

Compliance with these limits in combination with the other PM10 limits in Condition D.2.1 will limit PM10 emissions from the entire source to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) are not applicable.

Compliance Determination and Monitoring Requirements

Existing compliance requirements will not change as a result of this revision.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 049-24814-00007. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- 1. The wood-fired boiler at Pike Lumber Company, Inc. is equipped with a multiclone collector. The Permittee stated that the original PM/PM10 emission limits were derived from a control device collection efficiency of 80%. The Permittee has proposed to revise the PM and PM10 emission limits to reflect a collection efficiency of 25%.

D.1.1 PM and PM10 Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2(PSD) not applicable, the Permittee shall comply with the following:

- (a) The PM emissions from boiler EU-2.1 shall not exceed ~~4.67~~ **6.27** lbs/hr.
- (b) The PM10 emissions from boiler EU-2.1 shall not exceed ~~4.50~~ **5.64** lbs/hr.

2. The Permittee requested to revise the PM10 emission limit for the wood planer. A recent review of the stack test results showed a misinterpretation of 2004 test results. The Permittee reported the condensable particulate emission rate as PM10 emissions.

D.2.1 PM and PM10 Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2(PSD) not applicable, the PM/PM10 emissions from the woodworking operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
EU-20.1.1	Sawing Operation	1.80	1.03
EU-20.3	Wood Planer	10.1	0.098 9.44
EU-3.2	Storage Silo	1.78	1.03

3. The Permittee requested to revise the testing requirement for wood sawing operation (EU-20.1.1) and the storage silo (EU-3.2). Test results for these units have been approved by IDEM, OAQ.

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform following tests:

- (a) PM and PM10 testing for the wood sawing operation (EU-20.1.1) and the storage silo (EU-3.2) within **five (5) years from the date of the last valid compliance demonstration** ~~180 days after issuance of this permit~~, utilizing methods as approved by the Commissioner.
- (b) PM and PM10 testing for the wood planer (EU-20.3) within five (5) years from the date of the last valid compliance demonstration, utilizing methods as approved by the Commissioner.

PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

Conclusion and Recommendation

The proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 049-26048-00007. The staff recommended to the Commissioner that this FESOP Significant Permit Revision be approved.

**Appendix A: Emission Calculations
From the Wood Fired Boiler (EU-2.1)**

**Company Name: Pike Lumber Company, Inc.
Address: 719 Front Street, Akron, Indiana 46910
SPR #: 049-26048-00007
Reviewer: ERG/BL
Date: February 14, 2008**

Heat Input Capacity
MMBtu/hr

20.9

	Pollutant					
	PM	PM10	SO ₂	NO _x	VOC	CO
Emission Factor (lbs/MMBtu)	0.40	0.36	0.025	0.49	0.017	0.60
PTE before Control (tons/yr)	36.6	33.0	2.29	44.9	1.56	54.9
Cyclone Control Efficiency (%)	25%	25%	-	-	-	-
PTE after Control (lbs/hr)	6.27	5.64	0.52	10.2	0.36	12.5
PTE after Control (tons/yr)	27.5	24.7	2.29	44.9	1.56	54.9

Note: Emission factors are from AP-42, Chap 1.6, Wood Residue Combustion, Tables 1.6-1, 1.6-2, and 1.6-3 (09/03), and are the emission factors for dry wood combustion.

Methodology

PTE before Control (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

PTE after Control (lbs/hr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x (1 - Control Efficiency)

PTE after Control (tons/yr) = PTE before Control (tons/yr) x (1 - Control Efficiency)

**Appendix A: Emission Calculations
PM and PM10 Emissions
From the Woodworking Operations**

**Company Name: Pike Lumber Company, Inc.
Address: 719 Front Street, Akron, Indiana 46910
SPR #: 049-26048-00007
Reviewer: ERG/BL
Date: February 14, 2008**

1. Potential to Emit PM

Unit ID	Unit Description	Max. Throughput (tons/hr)	Uncontrolled PM Emission Factor * (lbs/ton)	PTE before Control (lbs/hr)	PTE before Control (tons/yr)	Control Device	Control Efficiency*	PTE after Control (lbs/hr)	PTE after Control (tons/yr)
EU-20.1.1	Wood Sawing Operations	25.7	0.35	9.00	39.4	Cyclone	80%	1.80	7.88
EU-20.3	Wood Planer	9.70	5.20	50.4	221	Cyclone	80%	10.1	44.2
EU-3.2	Storage Silo	8.90	1.00	8.90	39.0	Cyclone	80%	1.78	7.80
Total					299				59.9

* The emission factors for the wood sawing operations and the storage silo were provided by the source and will be verified by stack testing.
The uncontrolled emission factor for the wood planer is based on the stack test results in 2004 plus a safety factor and assuming an 80% control efficiency for the cyclone.

Methodology

PTE before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton)
PTE before Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs
PTE after Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x (1-Control Efficiency)
PTE after Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs x (1-Control Efficiency)

2. Potential to Emit PM10

Unit ID	Unit Description	Max. Throughput (tons/hr)	Uncontrolled PM10 Emission Factor* (lbs/ton)	PTE before Control (lbs/hr)	PTE before Control (tons/yr)	Control Device	Control Efficiency*	PTE after Control (lbs/hr)	PTE after Control (tons/yr)
EU-20.1.1	Wood Sawing Operations	25.7	0.20	5.14	22.5	Cyclone	80%	1.03	4.50
EU-20.3	Wood Planer	9.70	4.87	47.2	207	Cyclone	80%	9.44	41.35
EU-3.2	Storage Silo	8.90	0.58	5.16	22.6	Cyclone	80%	1.03	4.52
Total					252				50.4

* The emission factors for the wood sawing operations and the storage silo were provided by the source and will be verified by stack testing.
The uncontrolled emission factor for the wood planer is based on the 2004 stack test results plus a safety factor and assuming an 80% control efficiency for the cyclone.

Methodology

PTE before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton)
PTE before Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs
PTE after Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x (1-Control Efficiency)
PTE after Control (tons/yr) = Maximum Throughput (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs x (1-Control Efficiency)

**Appendix A: Emission Calculations
Potential to Emit Summary**

Company Name: Pike Lumber Company, Inc.
Address: 719 Front Street, Akron, Indiana 46910
SPR #: 049-26048-00007
Reviewer: ERG/BL
Date: February 14, 2008

1. Potential to Emit of Entire Source Prior To The Proposed Modification

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Wood Fired Boiler, with 80% PM/PM10 control	7.32	6.59	2.29	44.9	1.56	54.9	3.07
NG Fired Boiler	0.20	0.82	0.06	10.8	0.59	9.05	0.20
Woodworking Operations	59.9	9.45	-	-	-	-	-
Debarker (Insignificant)	0.11	0.11	-	-	-	-	-
Other Insignificant Woodworking Units	0.51	0.51	-	-	-	-	-
Other Insignificant Activities	1.00	1.00	-	-	1.00	-	Negligible
Total PTE	69.0	18.5	2.35	55.6	3.15	64.0	3.27

The PTE information for the existing units is from the TSD for SPR No.: 049-24814-00007 issued 11/09/2007.

2. Potential to Emit of The Proposed Modification

2A. Change in Potential to Emit of the Wood Fired Boiler Due to the Proposed Modification

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Wood Fired Boiler, with 80% PM/PM10 control	7.32	6.59	2.29	44.9	1.56	54.9	3.07
Wood Fired Boiler, with 25% PM/PM10 control	27.5	24.7	2.29	44.9	1.56	54.9	3.07
Total	20.1	18.1	-	-	-	-	-

2B. Change in Potential to Emit of the Woodworking Operations Due to the Proposed Modification

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Woodworking Operations	59.9	9.45	-	-	-	-	-
Woodworking Operations, with revised planer PM10 emissions	59.9	50.4	-	-	-	-	-
Total	-	40.9	-	-	-	-	-

2C. Potential to Emit of The Proposed Modification

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Total PTE of The Proposed Modification	20.1	59.0	-	-	-	-	-

3. Potential to Emit of Entire Source After The Proposed Modification

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Wood Fired Boiler, with 25% PM/PM10 control	27.5	24.7	2.29	44.9	1.56	54.9	3.07
NG Fired Boiler	0.20	0.82	0.06	10.8	0.59	9.05	0.20
Woodworking Operations, with revised planer PM10 emissions	59.9	50.4	-	-	-	-	-
Debarker (Insignificant)	0.11	0.11	-	-	-	-	-
Other Insignificant Woodworking Units	0.51	0.51	-	-	-	-	-
Other Insignificant Activities	1.00	1.00	-	-	1.00	-	Negligible
Total PTE	89.1	77.5	2.35	55.6	3.15	64.0	3.27