



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Mr. Phil Miller
Seymour Manufacturing Company, Inc.
500 North Broadway
Seymour, Indiana 47274

April 30, 2008

Re: Permit By Rule Status
071-26464-00042

Dear Mr. Miller:

On April 3, 2006, Seymour Manufacturing Co., Inc. submitted a letter with supporting data to the Office of Air Quality (OAQ) indicating that the stationary manufacturer of wooden and metal lawn and garden tools, located at 500 North Broadway, Seymour Indiana, satisfies the criteria to operate under the provisions of 326 IAC 2-10 (Permit by Rule).

On March 25, 2008, Seymour Manufacturing submitted the following justification such that the cyclones (C1, C2, C3, C4 and C5) will be considered as an integral part of the woodworking operations:

- (a) The cyclones are used primarily to collect material (wood chips, and sawdust) from the chuck machines, drill presses, and saws used to manufacture the wooden handles for the garden tools.
- (b) The source collects the wood material for use in a wood-fired boiler. To adequately fuel the boiler, Seymour Manufacturing would have to purchase 280 semi-trailer loads of saw dust per year if they did not use the cyclones to collect the waste wood and sawdust. To purchase wood fuel for the boiler on the open market would cost \$420,000 annually. The cost of a single semi-trailer load of sawdust is \$1,500. The costs of purchasing wood for use in the boiler are much greater than the annualized costs (capital and operating) for the cyclones.
- (c) The source would use the cyclones even if not required to do so by regulation, because they use them as material collection devices.

IDEM, OAQ has evaluated the justifications and agreed that the cyclones are an integral part of the woodworking operations. Therefore, the actual emissions for the woodworking facilities will be determined after the effect of the cyclones. The cyclones shall operate at all times when the woodworking equipment is in operation. Based on the data and information submitted and the provisions of 326 IAC 2-10 (Permit by Rule), Seymour Manufacturing Company, Inc., is now operating under Permit by Rule (PBR) Status.

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source limits actual emissions for every twelve (12) month period to less than twenty percent (20%) of any threshold for the following:
 - (1) A major source of regulated air pollutants, as defined by 326 IAC 2-7-1(22) (i.e., one hundred (100) tons per year of any regulated air pollutant, in all areas except

areas classified as serious, severe, and extreme nonattainment for ozone).
[326 IAC 2-10-3.1(1)(A)]

- (2) A major source of hazardous air pollutants (HAPs), as defined in Section 112 of the Clean Air Act (i.e., ten (10) tons per year of any individual HAP or twenty-five (25) tons per year of any combination of HAPs).
[326 IAC 2-10-3.1(1)(B)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3.1(2)]
- (c) Not later than thirty (30) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4.1]
- (d) Compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required. [326 IAC 2-10-4.1]

This source is hereby notified that this Permit by Rule approval does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state, or local requirements, such as New source Performance Standards (NSPS), 40 CFR Part 60, or National Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63. [326 IAC 2-10-5.1]

Any change or modification which will alter operations in such a way that the source will no longer comply with 326 IAC 2-10 (Permit by Rule), must obtain the appropriate approval from the OAQ under 326 IAC 2-1.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 before such change may occur. This source may at any time apply for a state operating permit under 326 IAC 2-6.1, a Part 70 permit under 326 IAC 2-7, a FESOP under 326 IAC 2-8, or an operating agreement under 326 IAC 2-9, as applicable. [326 IAC 2-10-1(b)]

Any violation of 326 IAC 2-10 (Permit by Rule) may result in administrative or judicial enforcement proceedings under IC 13-30-3 and penalties under IC 13-30-4, IC 13-30-5, or IC 13-30-6.
[326 IAC 2-10-6.1]

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.

Sincerely/Original Signed By:

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

ERG/BL

cc: File - Jackson County
Jackson County Health Department
Air Compliance Section
Billing, Licensing and Training Section