



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: Oct. 26, 2009

RE: Robert Weed Plywood Corp. / 039-27968-00178

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



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Minor Source Operating Permit OFFICE OF AIR QUALITY

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

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

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

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

Operation Permit No.: M039-27968-00178	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Oct. 26, 2009 Expiration Date: Oct. 26, 2014

TABLE OF CONTENTS

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B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]	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

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

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 17

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

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 Air Quality Requirements [326 IAC 2-1.1-5]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.4 PM and PM10 Control

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

- D.1.5 Visible Emissions Notations
- D.1.6 Baghouse Inspections
- D.1.7 Broken or Failed Bag Detection

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

- D.1.8 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 21

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

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8 2 12]
- D.2.2 Particulate [326 IAC 6-3-2]
- D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

- D.2.4 Record Keeping Requirement

Certification 24
Annual Notification 25
Malfunction Report 26

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary hard/softwood veneer, plywood and furniture parts manufacturing source.

Source Address:	705 Maple Street, Bristol, Indiana 46507
Mailing Address:	P.O. Box 487, Bristol, IN 46507-0487
General Source Phone Number:	(574) 848-7631
SIC Code:	2435, 2436, 2590, and 2672
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

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

- (4) One (1) Giardina coating system, identified as FE-7, constructed in 2007, using high-volume, low-pressure (HVLP) vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stacks F7.1 and F7.2;
 - (5) One (1) Spray 2 staining system, identified as FE-8, constructed in 2007, using high-volume, low-pressure (HVLP) application of a water-based stain, using dry filters for particulate control, exhausting through Stack F8;
 - (6) One (1) three-level conveyor/drying system, constructed in 2007, equipped with a natural gas drying oven rated at 3.5 MMBtu/hr, servicing FE-1, FE-4, FE-5, and FE-8, exhausting through a combined exhaust system that outlets to Stacks FC2 and FC3;
- (e) Woodworking operations in Buildings 5, 6, 16, 14N, 31, and 32, consisting of chop saws, multi-blade saws, single blade saws, drilling machines, edge banders, foilers, moulders, routers, sanders, and shapers. Particulate emissions from the woodworking operations are controlled by baghouses as follows:
- (1) Building 5 and Building 6 Woodworking Operations, with a combined maximum capacity of 7,821 pounds of wood per hour, with particulate emission controlled by Baghouse DC-01, installed in 1990;
 - (2) Building 31 and Building 32 Woodworking Operations, with a combined maximum capacity of 1,500 pounds of wood per hour, with particulate emission controlled by Baghouse DC-02, installed in 1978;
 - (3) Building 14N Woodworking Operations A, with a maximum capacity of 3,911 pounds of wood per hour, with particulate emission controlled by Baghouse DC-04 installed in 2000.
 - (4) Building 16 Woodworking Operations, with a maximum capacity of 23,375 pounds of wood per hour, with particulate emission controlled by Baghouse DC-05 installed in February 2000.
 - (5) Building 14N Woodworking Operations B, constructed in 2007, with a maximum capacity of 2933 pounds of wood per hour, with particulate emission controlled by Baghouse DC-06 and exhausting to the indoors, installed in 2007.
 - (6) One (1) saw dust conveying system, constructed in 2007, pneumatically conveying saw dust captured by Baghouses DC-04, DC-05, and DC-06 to one (1) sawdust storage silo, controlled by an accumulation Baghouse DC-07.
- (f) Eleven (11) wood veneer wrappers, equipped with roll coating applicators, installed in 1985, 1985, 1985, 1992, 1995, 1996, 1997, 1999, 2004, 2004, and 2005, capacity: 1,155 square feet of veneer per hour each.
- (g) One (1) natural gas-fired dryer, known as F-1, installed in 1993, rated at 1.20 million British thermal units per hour.
- (h) Ninety-five (95) natural gas-fired infrared heaters, known as H1 through H95, installed in between 1990 and 1998, rated at 0.125 million British thermal units per hour, each.

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M039-27968-00178, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, 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

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

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

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

B.7 Duty to Provide Information

- (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

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

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

Indianapolis, Indiana 46204-2251

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M039-27968-00178 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 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 and Enforcement Branch, 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

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

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

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

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) Woodworking operations in Buildings 5, 6, 16, 14N, 31, and 32, consisting of chop saws, multi-blade saws, single blade saws, drilling machines, edge banders, foilers, moulders, routers, sanders, and shapers. Particulate emissions from the woodworking operations are controlled by baghouses as follows:
- (1) Building 5 and Building 6 Woodworking Operations, with a combined maximum capacity of 7,821 pounds of wood per hour, with particulate emission controlled by Baghouse DC-01, installed in 1990;
 - (2) Building 31 and Building 32 Woodworking Operations, with a combined maximum capacity of 1,500 pounds of wood per hour, with particulate emission controlled by Baghouse DC-02, installed in 1978;
 - (3) Building 14N Woodworking Operations A, with a maximum capacity of 3,911 pounds of wood per hour, with particulate emission controlled by Baghouse DC-04 installed in 2000.
 - (4) Building 16 Woodworking Operations, with a maximum capacity of 23,375 pounds of wood per hour, with particulate emission controlled by Baghouse DC-05 installed in February 2000.
 - (5) Building 14N Woodworking Operations B, constructed in 2007, with a maximum capacity of 2933 pounds of wood per hour, with particulate emission controlled by Baghouse DC-06 and exhausting to the indoors, installed in 2007.
 - (6) One (1) saw dust conveying system, constructed in 2007, pneumatically conveying saw dust captured by Baghouses DC-04, DC-05, and DC-06 to one (1) sawdust storage silo, controlled by an accumulation Baghouse DC-07.

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

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

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

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

Baghouse ID	Process Weight Rate (pounds/hour)	Process Weight Rate (tons/hour)	PTE of PM Before Controls (pounds/hour)	PTE of PM After Controls (pounds/hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (pounds/hour)
DC-01	7821.34	3.91	1015.7	1.02	10.22
DC-02	1500.00	0.75	321.4	0.32	3.38
DC-04	3910.67	1.96	604.29	0.60	6.43
DC-05	23374.61	11.69	604.3	0.60	21.29
DC-06	14141.6	7.07	1247.1	1.25	15.20
DC-07	41426.88	20.71	385.7	1.25	31.24

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

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

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

D.1.2 Air Quality Requirements [326 IAC 2-1.1-5]

IDEM, OAQ, modeling analysis was conducted for permit number T039-25383-00178, issued on December 13, 2007. The modeling results indicate that, without additional measures, the PM10 emissions could potentially result in ground level PM10 concentrations that violate both the annual and 24 hour NAAQS for PM10. IDEM, OAQ and Robert Weed Plywood Corporation have mutually agreed to the following enforceable permit condition to avoid potential violations of the NAAQS for PM10 emissions from Baghouse DC-06:

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

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

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

Compliance Determination Requirements

D.1.4 PM and PM10 Control

In order to comply with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

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

D.1.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).
- (c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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 C - Response to Excursions or Exceedances).

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

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouses DC-01, DC-02, DC-04, DC-05, DC-06, and DC-07 stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) wood curtain coater, equipped with flowcoater applicators, installed in 1993, capacity: 5,120 square feet of hard/softwood per hour.
- (b) Four (4) panel laminators, known as Lam-1, Lam-2, Lam-3, and Lam-4, equipped with roll coating applicators, installed in 1986, 1990, 1995, and 2001, capacity: 8,700 square feet of hard/softwood, veneer, and/or plywood per hour each.
- (c) One (1) ink coater, installed in 2003, capacity: 2,130 square feet of hard/softwood, veneer, and/or plywood per hour.
- (d) One (1) wood surface coating operation, identified as EU-02, approved for construction in 2007, including the following:
 - (1) One (1) Spray 1 staining system, identified as FE-1, constructed in 2007, using air-assisted airless spray application of a solvent-based stain, using dry filters for particulate control, exhausting through Stack F1;
 - (2) One (1) fan coater, identified as FE-4, constructed in 2007, using a non-atomizing flowcoating application of a solvent-based coating, exhausting through Stack F4;
 - (3) One (1) Paint-O-Matic coating system, identified as FE-5, constructed in 2007, using air-assisted airless vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stack F8;
 - (4) One (1) Giardina coating system, identified as FE-7, constructed in 2007, using high-volume, low-pressure (HVLP) vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stacks F7.1 and F7.2;
 - (5) One (1) Spray 2 staining system, identified as FE-8, constructed in 2007, using high-volume, low-pressure (HVLP) application of a water-based stain, using dry filters for particulate control, exhausting through Stack F8;
 - (6) One (1) three-level conveyor/drying system, constructed in 2007, equipped with a natural gas drying oven rated at 3.5 MMBtu/hr, servicing FE-1, FE-4, FE-5, and FE-8, exhausting through a combined exhaust system that outlets to Stacks FC2 and FC3;
- (f) Nine (9) wood veneer wrappers, equipped with roll coating applicators, installed in 1985, 1992, 1995, 1996, 1997, 1999, 2004, 2004, and 2005, capacity: 1,155 square feet of veneer per hour each.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

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

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

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

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from FE-1, FE-5, and FE-8 each shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control devices in accordance with manufacturer's specification.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground; and
 - (2) Operates equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, FE-7, and FE-8 and their control devices.

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

D.2.4 Record Keeping Requirement

- (a) To document compliance with Condition D.2.2(c), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Robert Weed Plywood Corporation
Source Address: 705 Maple Street, Bristol, Indiana 46507
Mailing Address: P.O. Box 487, Bristol, IN 46507-487
MSOP No.: M039-27968-00178

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Robert Weed Plywood Corporation
Address:	705 Maple Street
City:	Bristol, Indiana 46507
Phone #:	(574) 848-7631
MSOP #:	M039-27968-00178

I hereby certify that Robert Weed Plywood Corporation is : still in operation.

no longer in operation.

I hereby certify that Robert Weed Plywood Corporation is : in compliance with the requirements of MSOP M039-27968-00178.

not in compliance with the requirements of MSOP M039-27968-00178.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Title V Transitioning to a
Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	Robert Weed Plywood Corporation
Source Location:	705 Maple Street, Bristol, Indiana 46507
County:	Elkhart County
SIC Code:	2431, 2499, 2541, and 5031
Operation Permit No.:	M039-27968-00178
Permit Reviewer:	Jeff Scull

On May 21, 2009, the Office of Air Quality (OAQ) received an application from Robert Weed Plywood Corporation related to the transition of a Title V Operating Permit to a Minor Source Operating Permit (MSOP).

Source Permit History

Robert Weed Plywood Corporation was issued a Federally Enforceable State Operating Permit (FESOP) No. F039-11882-00178 on September 13, 2001, for a stationary hard/softwood veneer, plywood and furniture parts manufacturing source located at 705 Maple Street, Bristol, Indiana 46507. On June 18, 2007, the Office of Air Quality (OAQ) received an application from the source related to the construction and operation of new surface coating operations, wood working equipment, two (2) baghouses, a pneumatic saw dust conveyance system, a saw dust storage silo, four (4) wood veneer wrappers, and an ink coater. On September, 17, 2007, Robert Weed Plywood Corporation provided updated information regarding the air flow rate and outlet grain loading for each of the existing baghouses controlling the woodworking operation. Based on this updated information, the source requested to transition from a FESOP to a Title V Permit. On December 13, 2007 the source was issued a Title V Operating Permit, permit number T039-25833-00178. On May 21, 2009, the Office of Air Quality (OAQ) received an application from the source related to transitioning from a Title V Permit to an MSOP due to replacing the surface coating materials with materials using low VOC and little to or no HAP at the source.

Existing Approvals

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

- (a) Title V Permit No. T039-25833-00178, issued on December 13, 2007.

Due to this application, the source is transitioning from a Title V Permit to a MSOP.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, 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 Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

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. Elkhart 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) Elkhart County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

(a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

(b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Robert Weed Plywood Corporation on May 21, 2009, relating to transitioning from a Title V Permit to an MSOP due to replacing the surface coating materials with materials using low VOC and little to or no HAP at the source.

The source consists of the following permitted emission units:

- (a) One (1) wood curtain coater, equipped with flowcoater applicators, installed in 1993, capacity: 5,120 square feet of hard/softwood per hour.
- (b) Four (4) panel laminators, known as Lam-1, Lam-2, Lam-3, and Lam-4, equipped with roll coating applicators, installed in 1986, 1990, 1995, and 2001, capacity: 8,700 square feet of hard/softwood, veneer, and/or plywood per hour each.
- (c) One (1) ink coater, installed in 2003, capacity: 2,130 square feet of hard/softwood, veneer, and/or plywood per hour.
- (d) One (1) wood surface coating operation, identified as EU-02, constructed in 2007, including the following:
 - (1) One (1) Spray 1 staining system, identified as FE-1, constructed in 2007, using air-assisted airless spray application of a solvent-based stain, using dry filters for particulate control, exhausting through Stack F1;
 - (2) One (1) fan coater, identified as FE-4, constructed in 2007, using a non-atomizing flowcoating application of a solvent-based coating, exhausting through Stack F4;
 - (3) One (1) Paint-O-Matic coating system, identified as FE-5, constructed in 2007, using air-assisted airless vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stack F8;
 - (4) One (1) Giardina coating system, identified as FE-7, constructed in 2007, using high-volume, low-pressure (HVLP) vacuum coating application of a water-based coating, with coating overspray recycled internally, exhausting through dry filters to Stacks F7.1 and F7.2;
 - (5) One (1) Spray 2 staining system, identified as FE-8, constructed in 2007, using high-volume, low-pressure (HVLP) application of a water-based stain, using dry filters for particulate control, exhausting through Stack F8;
 - (6) One (1) three-level conveyor/drying system, constructed in 2007, equipped with a natural gas drying oven rated at 3.5 MMBtu/hr, servicing FE-1, FE-4, FE-5, and FE-8, exhausting through a combined exhaust system that outlets to Stacks FC2 and FC3;
- (e) Woodworking operations in Buildings 5, 6, 16, 14N, 31, and 32, consisting of chop saws, multi-blade saws, single blade saws, drilling machines, edge banders, foilers, moulders, routers, sanders, and shapers. Particulate emissions from the woodworking operations are controlled by baghouses as follows:
 - (1) Building 5 and Building 6 Woodworking Operations, with a combined maximum capacity of 7,821 pounds of wood per hour, with particulate emission controlled by Baghouse DC-01, installed in 1990;
 - (2) Building 31 and Building 32 Woodworking Operations, with a combined maximum capacity of 1,500 pounds of wood per hour, with particulate emission controlled by Baghouse DC-02, installed in 1978;
 - (3) Building 14N Woodworking Operations A, with a maximum capacity of 3,911 pounds of wood per hour, with particulate emission controlled by Baghouse DC-

04 installed in 2000.

- (4) Building 16 Woodworking Operations, with a maximum capacity of 23,375 pounds of wood per hour, with particulate emission controlled by Baghouse DC-05 installed in February 2000.
- (5) Building 14N Woodworking Operations B, constructed in 2007, with a maximum capacity of 2933 pounds of wood per hour, with particulate emission controlled by Baghouse DC-06 and exhausting to the indoors, installed in 2007.
- (6) One (1) saw dust conveying system, constructed in 2007, pneumatically conveying saw dust captured by Baghouses DC-04, DC-05, and DC-06 to one (1) sawdust storage silo, controlled by an accumulation Baghouse DC-07.
- (f) Eleven (11) wood veneer wrappers, equipped with roll coating applicators, installed in 1985, 1985, 1985, 1992, 1995, 1996, 1997, 1999, 2004, 2004, and 2005, capacity: 1,155 square feet of veneer per hour each.
- (g) One (1) natural gas-fired dryer, known as F-1, installed in 1993, rated at 1.20 million British thermal units per hour.
- (h) Ninety-five (95) natural gas-fired infrared heaters, known as H1 through H95, installed in between 1990 and 1998, rated at 0.125 million British thermal units per hour, each.

“Integral Part of the Process” Determination (if applicable)

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

The baghouse for particulate control shall be in operation and control emissions from the woodworking operations in Buildings 5, 6, 16, 14N, 31, and 32 at all times that the woodworking operation is in operation.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	19.2
PM10 ⁽¹⁾	19.2
PM2.5	19.2
SO ₂	0.04
NO _x	7.26
VOC	54.69
CO	6.10

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Toluene	0.065
Acetaldehyde	1.5E-03
Hexane*	0.13
Xylene	0.065
HCOH	2.9E-05
TOTAL HAPs	0.27

* worst single HAP

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC's is greater than twenty-five (25) tons per year, but less than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements for 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), (326 IAC 20-14), are not included in this permit, since this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (c) The requirements for 40 CFR 63, Subpart MMMM (National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products), (326 IAC 20-80), are not included in this permit, since this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not perform surface coating of miscellaneous metal parts and products.
- (d) The requirements for 40 CFR 63, Subpart OOOO (National Emission Standards for Printing,

Coating and Dyeing of Fabrics and Other Textiles), (326 IAC 20-77), are not included in this permit, since this source is not a major source of HAPs as defined in 60 CFR 63.2 and does not perform print, coating and dyeing of fabrics and other textiles.

- (e) The requirements for 40 CFR 63, Subpart PPPP (National Emission Standards for Surface Coating of Plastic Parts and Products), (326 IAC 20-81), are not included in this permit, since this source is not a major source of HAPs as defined in 60 CFR 63.2 and only coats wood cabinets and furniture.
- (f) The requirements for 40 CFR 63, Subpart QQQQ (National Emission Standards for Surface Coating of Wood Building Products), (326 IAC 20-79), are not included in this permit, since this source is not a major source of HAPs as defined in 60 CFR 63.2 and only coats wood cabinets and furniture.
- (g) The requirements of 40 CFR 60, Subpart HHHHHH, NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63.11169 - 63.11180), are not included in this permit, since this area source does not perform paint stripping using chemical strippers that contain methylene chloride for the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coatings that contain chromium, lead manganese, nickel or cadmium to a plastic and/or metal substrates.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (i) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 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 County, 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.

- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because the source does not have fugitive emissions exceeding twenty-five (25) tons per year.

Surface Coating Operation

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

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

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground; and

- (B) Operates equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (i) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The wood curtain coater*, the panel laminators*, and emission units FE-1, FE-4, FE-5, and FE-8 are each subject to the requirements 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Therefore, those units are not subject to the requirements of 326 IAC 8-1-6.

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

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

- (k) 326 IAC 8-11 (Wood Furniture Coatings)
The wood curtain coater*, the panel laminators*, and emission units FE-1, FE-4, FE-5, and FE-8 are not subject to this rule, because this rule pertains to wood furniture coating in Lake, Porter, Clark and Floyd Counties. This source is in Elkhart County.

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

- (1) The veneer wrappers, the ink coater, and emission unit FE-7, are each not subject to the requirements 326 IAC 8-2-12, since they each have potential and actual emissions of less than fifteen (15) pounds of VOC per day before add-on controls. These units are not subject to any other rule under 326 IAC 8 (Article 8: Volatile Organic Compound Rules).

*Note: In the Technical Support Document (TSD) for FESOP No. 039-11882-00178, issued on September 13, 2001, the wood curtain coater and the panel laminators were previously determined not to be subject to the requirements 326 IAC 8-2-12, since the source did not surface coat "wood furnishings". However, IDEM has determined that the requirements 326 IAC 8-2-12 apply to the surface coating of both "wood furnishings" and "wood furniture components". Therefore, the wood curtain coater and the panel laminators are now subject to the requirements 326 IAC 8-2-12.

- (2) The wood curtain coater*, the panel laminators*, and emission units FE-1, FE-4, FE-5, and FE-8 are each subject to the requirements 326 IAC 8-2-12, since they each could potentially have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the wood curtain coater, the panel laminators, and emission units FE-1, FE-4, FE-5, and FE-8, the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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

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

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

Woodworking Operation

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

Baghouse ID	Process Weight Rate (pounds/hour)	Process Weight Rate (tons/hour)	PTE of PM Before Controls (pounds/hour)	PTE of PM After Controls (pounds/hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (pounds/hour)
DC-01	7821.34	3.91	1015.7	1.02	10.22
DC-02	1500.00	0.75	321.4	0.32	3.38
DC-04	3910.67	1.96	604.29	0.60	6.43
DC-05	23374.61	11.69	604.3	0.60	21.29
DC-06	14141.6	7.07	1247.1	1.25	15.20
DC-07	41426.88	20.71	385.7	1.25	31.24

*Note: In the Technical Support Document (TSD) for FESOP No. 039-11882-00178, issued on September 13, 2001, the wood curtain coater and the panel laminators were previously determined not to be subject to the requirements 326 IAC 8-2-12, since the source did not surface coat "wood furnishings". However, IDEM has determined that the requirements 326 IAC 8-2-12 apply to the surface coating of both "wood furnishings" and "wood furniture components". Therefore, the wood curtain coater and the panel

laminators are now subject to the requirements 326 IAC 8-2-12.

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

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

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

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

Natural Gas-fired Heaters

- (n) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
 The natural gas-fired heaters (H1 through H95), dryer (F1), and drying oven are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.
- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 The natural gas-fired heaters (H1 through H95), dryer (F1), and drying oven are each exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired heaters (H1 through H95) and dryer (F1) are each exempt from the requirements of 326 IAC 6-3, since they each have potential particulate emissions less than five hundred fifty one thousandths (0.551) pound per hour.
- (p) 326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)
 Each of the natural gas-fired heaters (H1 through H95), dryer (F1), and drying oven are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
FE-1, FE-5 and FE-8 dry filters	overspray observations	as needed
woodworking baghouses DC-01, DC-02, DC-04, DC-05, DC-06, and DC-07 stack exhaust	visible emission notations	daily
woodworking baghouses DC-01, DC-02, DC-04, DC-05, DC-06, and DC-07	baghouse inspection	quarterly

- (b) The testing requirements applicable to this source are as follows:

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 21, 2009. Additional information was received on July 16, 2009.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 039-27968-00178. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jeff Scull at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
Operating Permit No.: M039-27968-00178
Reviewer: Jeff Scull**

Process Description	Uncontrolled/Unlimited Potential to Emit (tons/year)							
	PM	PM10/PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Curtain Coater	0.00	0.00	-	-	1.67	-	0.00	0.00
Spray 1 Staining System (FE-1)	0.00	0.00	-	-	11.78	-	0.00	0.00
Fancoater Coating System (FE-4)	0.00	0.00	-	-	2.67	-	0.13	0.06 toluene
Paint-O-Matic Coating System (FE-5)	0.00	0.00	-	-	1.36	-	0.00	0.00
Spray 2 Staining System (FE-8)	0.00	0.00	-	-	1.36	-	0.00	0.00
Ink Coater	0.00	0.00	-	-	2.41	-	0.00	0.00
Giardina Coating System (FE-7)	0.77	0.77	-	-	0	-	0.00	0.00
Woodworking Operation	18.3	18.3	-	-	0	-	-	-
Nine (9) Vaneer Wrappers	0.00	0.00	-	-	7.10E-04	-	0.00	0.00
Four (4) Panel Laminators	0.00	0.00	-	-	33.05	-	1.81E-03	1.45E-03 acetaldehyde
Heaters and Dryers	0.14	0.14	0.04	7.26	0.40	6.10	0.14	0.13 hexane
Total	19.2	19.2	0.04	7.26	54.69	6.10	0.27	0.13 hexane

Process Description	Controlled / Limited Potential to Emit (tons/year)								
	PM	PM10/PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Curtain Coater	0.00	0.00	-	-	Less Than 100.0	-	Less Than 25.0	Less Than 10.0	
Spray 1 Staining System (FE-1)	0.00	0.00	-	-		-			
Fancoater Coating System (FE-4)	0.00	0.00	-	-		-			toluene
Paint-O-Matic Coating System (FE-5)	0.00	0.00	-	-		-			
Spray 2 Staining System (FE-8)	0.00	0.00	-	-		-			
Ink Coater	0.00	0.00	-	-		-			
Giardina Coating System (FE-7)	0.15	0.15	-	-		-			
Woodworking Operation	18.3	18.3	-	-		-			
Nine (9) Vaneer Wrappers	0.00	0.00	-	-		-			
Four (4) Panel Laminators	0.00	0.00	-	-		-			acetaldehyde
Heaters and Dryers	0.14	0.55	0.04	7.26	6.10	hexane			
Total	Less Than 18.6	Less Than 19.0	0.04	7.26	Less Than 100.0	6.10	Less Than 25.00	Less Than 10.00	

**Appendix A: Emissions Calculations
 Hazardous Air Pollutants (HAPs)
 Ink Coater, Curtain Coater, Vaneer Wrappers, and Panel Laminators**

**Company Name: Robert Weed Plywood Corporation
 Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
 NSR and Part 70 Operating Permit No.: M039-27968-00178
 Reviewer: Jeff Scull**

Unrestricted Potential to Emit

Operation and Material*	Maximum Usage (lbs/hr)	Weight % Ethanol	Weight % Xylenes	Weight % Mn Compounds	Weight % Acetaldehyde	Weight % HCOH	Weight % Toluene	PTE of Ethanol (tons/yr)	PTE of Xylenes (tons/yr)	PTE of Mn Compounds (tons/yr)	PTE of Acetaldehyde (tons/yr)	PTE of HCOH (tons/yr)	PTE of Toluene (tons/yr)	
Nine (9) Vaneer Wrappers														
Nat'l Starch Glue for Wrapping VY-LOK (40-1105)	0.16	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
Each Panel Laminator														
A.I.T. Epoxy Glue (2271-A)	0.08	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
A.I.T. Epoxy Glue (2271-B)	0.06	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
Bayer Crosslink (7063)	30.14	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
Daubert Epoxy (X6496-A)	51.44	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
Daubert Epoxy (X6496-B)	43.47	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
HB Fuller Epoxy (Vinyl Lam Adhesive) (RK3489)	0.05	0%	0%	0%	0.0854%	0.0170%	0.0041%	0	0	0	2.0E-04	3.9E-05	9.5E-06	
HB Fuller Tinted Lam. Adhesive (RK2463)	0.06	0%	0%	0%	0.0635%	0.0127%	0.0029%	0	0	0	1.7E-04	3.3E-05	7.5E-06	
IFS Paper Lam. Adhesive (G-2556)	0.05	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
Nat'l Casein Laminate (PVC-E MV)	117.33	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
Nat'l Casein Lam Adhesive (PVC-E914)	125.33	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
Dural Paper Laminate Adhesive (G-2556)	66.00	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	
								PTE of Laminator Lam-1 =	0	0	0	3.6E-04	7.2E-05	1.7E-05
								PTE of Laminator Lam-2 =	0	0	0	3.6E-04	7.2E-05	1.7E-05
								PTE of Laminator Lam-3 =	0	0	0	3.6E-04	7.2E-05	1.7E-05
								PTE of Laminator Lam-4 =	0	0	0	3.6E-04	7.2E-05	1.7E-05

ACRONYMS

Mn = Manganese
 HCOH = Formaldehyde

PTE of Single HAPs (tons/yr)	0.0E+00	0.0E+00	0.0E+00	1.5E-03	2.9E-04	6.8E-05
PTE of Total HAPs (tons/yr)		0.00				

METHODOLOGY

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

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

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

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

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

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

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

Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
Operating Permit No.: M039-27968-00178
Reviewer: Jeff Scull

Unrestricted Potential to Emit

Operation and Material*	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM10/PM2.5 (lb/hr)	PTE PM10/PM2.5 (tons/yr)	PTE PM10 After Control (tons/yr)	lb VOC per gal solids	Transfer Efficiency**	Overspray Control Efficiency***	
One (1) Spray 1 Solvent-Based Staining System (FE-1)																							
HAPs Lacquer Thinner Med	6.76	100.00%	81.45%	0.00%	18.55%	82.00%	0.00%	0.002	1000.00	48.00	13.52	6.97	1.25	2.51	60.2	11.0	0.00	0.00	0.00	0.0	50%	98%	
HAPs Lacquer Thinner Fast	6.76	100.00%	86.54%	0.00%	13.46%	87.02%	0.00%	0.002	100.00	4.80	1.35	7.01	0.91	0.18	4.4	0.8	0.00	0.00	0.00	0.0	50%	98%	
Butyl Cellosolve C1396	7.50	100.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.002	50.00	2.40	0.75	0.00	0.00	0.00	0.0	0.00	0.00	0.00	0.00	0.0	50%	98%	
PTE of Worst Case Stain =												7.01	1.25	2.51	64.6	11.8	0.00	0.00	0.00	0.00	0.0		
One (1) Fancoater Solvent-Based Coating System (FE-4)																							
WU0304/00 AC self sealer pre-cat transparent blend	7.42	0.00%	58.99%	100.00%	41.01%	0.00%	0.00%	0.002	100.00	4.80	1.48	3.04	3.04	0.61	14.61	2.67	0	0	0	NA	100%	NA	
Total for Fancoater FE-4 =												0.61	14.6	2.7	0	0	0						
One (1) Ink Coater																							
652-B5M-178 Black Mono Primer	11.2	44.80%	42.33%	55.20%	2.47%	56.69%	39.60%	0.002	1000.00	48.00	22.34	0.64	0.28	0.55	13.22	2.41	0	0	0	NA	100%	NA	
Total for Inkcoater=												0.5509	13.22	2.41	0	0	0						
One (1) Paint-O-Matic Water-Based Coating System (FE-5)																							
Rollie Williams 7560.601	8.41	100.00%	0.00%	0.00%	3.68%	0.00%	0.06%	0.001	1000.0	24.00	8.41	0.31	0.31	0.31	7.43	1.36	0.00	0.00	0.00	515.8	90%	80%	
PTE of Worst Case Coating =												0.31	0.31	0.31	7.4	1.4	0.00	0.00	0.00	0.00	515.8		
One (1) Giardina Water-Based Coating System (FE-7)																							
IS 2490/00 Acrylic Topcoat	8.74	0.00%	0.00%	100.00%	0.00%	0.00%	1.00%	0.001	1000.0	24.00	8.74	0	0	0	0	0	0.17	0.77	0.15	0	98%	80%	
Total for Giardina FE-7 =												0.00	0.00	0.00	0.17	0.77	0.15						
One (1) Curtian Coater																							
High Hide White	13.4	56.00%	54.58%	44.00%	1.42%	0.00%	43.00%	0.00200	1000.00	48.00000	26.880	0.19	0.19	0.38	9.16	1.67	0.00	0.00	0.00	0.44	100%	100.00	
Total for Curtian Coater												0.38	9.16	1.67	0.00	0.00	0.000						
One (1) Spray 2 Water-Based Staining System (FE-8)																							
Rollie Williams 7560.601	8.41	100.00%	0.00	0.00	3.68%	0.00	0.06%	0.001	1000.00	24.00	8.41	0.31	0.31	0.31	7.43	1.36	0.00	0.00	0.00	515.8	90%	80%	
Total for Fancoater FE-8 =												0.31	7.43	1.36	0.00	0.00	0.00						

METHODOLOGY

*All materials "as supplied".

**Actual Emissions based on 8 hours per day

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

FE-1 uses HVLP spray guns and dry filters with 98% overspray control efficiency
FE-4 uses a non-atomizing flowcoating system with no control
FE-5 and FE-7 use vacuum coating application assuming 80% of coating overspray is recycled internally
FE-8 uses air assisted airless application and dry filters with 98% overspray control efficiency

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

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

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

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

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

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

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

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

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

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

Total = Worst Case Coatings + Sum of all solvents used

116.4	21.2	0.2	0.8	0.15
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**Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs)
EU-02 Surface Coating Operations**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
Operating Permit No.: M039-27968-00178
Reviewer: Jeff Scull**

Unrestricted Potential to Emit

Operation and Material*	Maximum Usage (lbs/hr)	Weight % TCE	Weight % Toluene	Weight % Xylene	Weight % MIBK	Weight % Methanol	Weight % GE	Weight % HCOH	PTE of TCE (tons/yr)	PTE of Toluene (tons/yr)	PTE of Xylene (tons/yr)	PTE of MIBK (tons/yr)	PTE of Methanol (tons/yr)	PTE of GE (tons/yr)	PTE of HCOH (tons/yr)
One (1) Spray 1 Solvent-Based Staining System (FE-1)															
HAPs Lacquer Thinner Med	13.52	0%	0%	0%		0.0%	0%	0%	0	0	0	0	0.00	0	0
HAPs Lacquer Thinner Fast	1.35	0%	0%	0%	0%	0.0%	0%	0%	0	0	0	0	0.00	0	0
Butyl Cellosolve (2-Butoxyethanol) (23400)	0.75	0%	0%	0%	0%	0.0%	0%	0%	0	0	0	0	0.00	0	0
PTE of Worst Case Stain =									0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) Fancoater Solvent-Based Coating System (FE-4)															
WU0304/00 AC self sealer pre-cat transparent blend	1.48	0%	1%	1%	0%	0%	0%	0%	0	0.065	0.064999	0	0	0.00	0
Total for Fancoater FE-4 =									0.00	0.06	0.06	0.00	0.00	0.00	0.00
One (1) Paint-O-Matic Water-Based Coating System (FE-5)															
Rollie Williams 7560.601	8.41	0%	0%	0%	0%	0%	0.00%	0%	0	0	0	0	0	0.00	0
PTE of Worst Case Coating =									0.00	0.00	0.00	0.00	0.00	0.00	0
One (1) Giardina Water-Based Coating System (FE-7)															
IS 2490/00 Acrylic Topcoat	8.74	0%	0%	0%	0%	0%	0%	0.000%	0	0	0	0	0	0	0.00
Total for Fancoater FE-7 =									0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) Spray 2 Water-Based Staining System (FE-8)															
Rollie Williams 7560.601	8.41	0%	0.00%	0.00%	0.0%	0%	0%	0%	0	0.00	0.00	0.00	0	0.00	0
Total for Fancoater FE-8 =									0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) Ink Coater															
652-B5M-178 Black Mono Primer	22.34	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total for Ink Coater =									0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) Curtian Coater															
E60WJ539 High Hide White	26.88	0%	0%	0%	0%	0%	1%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total for Curtian Coater =									0	0	0	0	0	0	0

ACRONYMS

BEHP = Bis(2-ethyl-hexyl) phthalate
TCE = Trichloroethylene

MIBK - Methyl Isobutyl Ketone
GE = Glycol Ethers
HCOH = Formaldehyde

PTE of Single HAPs (tons/yr)	0.00	0.06	0.06	0.00	0.00	0.00	0.00
PTE of Total HAPs (tons/yr)	0.13						

METHODOLOGY

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

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

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

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

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

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

**Appendix A: Emission Calculations
Woodworking Operations**

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
Operating Permit No.: M039-27968-00178
Reviewer: Jeff Scull**

Potential to Emit (PTE) PM, PM10, and PM2.5

Baghouse ID	Baghouse Outlet Grain Loading (grains/acf)	Baghouse Outlet Air Flow Rate (acfm)	PTE of PM/PM10/PM2.5 After Controls* (lbs/hr)	PTE of PM/PM10/PM2.5 After Controls* (tons/yr)	Control Efficiency (%)	PTE of PM/PM10/PM2.5 Before Controls* (lbs/hr)	PTE of PM/PM10/PM2.5 Before Controls* (tons/yr)
DC-01	0.0030	39500	1.02	4.45	99.9%	1015.7	4448.8
DC-02	0.0030	12500	0.32	1.41	99.9%	321.4	1407.9
DC-04	0.0030	23500	0.60	2.65	99.9%	604.3	2646.8
DC-05	0.0030	23500	0.60	2.65	99.9%	604.3	2646.8
DC-06	0.0030	48500	1.25	5.46	99.9%	1247.1	5462.5
DC-07**	0.0030	15000	0.39	1.69	99.9%	385.7	1689.4
Total			4.18	18.30		4178.6	18302.1

326 IAC 6-3-2 Allowable PM Emission Rate

Baghouse ID	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	PTE of PM After Controls (lbs/hr)
DC-01	7821.34	3.91	10.22	1.02
DC-02	1500.00	0.75	3.38	0.32
DC-04	3910.67	1.96	6.43	0.60
DC-05	23374.61	11.69	21.29	0.60
DC-06	14141.6	7.07	15.20	1.25
DC-07**	41426.88	20.71	31.24	1.25

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

METHODOLOGY

Potential to Emit PM/PM10/PM2.5 After Controls (lbs/hr) = [Baghouse Outlet Grain Loading (grains/acf)] * [Baghouse Outlet Air Flow Rate (acfm)] * [60 min/hr] * [lbs/7000 grains]
 Potential to Emit PM/PM10/PM2.5 After Controls (tons/yr) = [Potential to Emit PM/PM10/PM2.5 After Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

Potential to Emit PM/PM10/PM2.5 Before Controls (lbs/hr) = [Potential to Emit PM/PM10/PM2.5 After Controls (lbs/hr)] / (1 - control efficiency)
 Potential to Emit PM/PM10/PM2.5 Before Controls (tons/yr) = [Potential to Emit PM/PM10/PM2.5 Before Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

*Particulate controls are integral to the normal woodworking operation of the facility.
 Potential emissions for woodworking particulate matter were calculated after consideration of the controls.
 PM = Particulate Matter, PM-10 = Particulate Matter less than 10 micrometers, PM2.5=Particulate Matter less than 2.5 micrometers,PTE = Potential to Emit

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

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

**Company Name: Robert Weed Plywood Corporation
Address City IN Zip: 705 Maple Street, Bristol, Indiana 46507
Operating Permit No.: M039-27968-00178
Reviewer: Jeff Scull**

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr					
					PM*	PM10/PM2.5*	SO2	NOx**	VOC	CO
					1.9	7.6	0.6	100	5.5	84.0
Infrared Heaters (H1 - H95)	95	0.125	11.875	104.03	9.9E-02	0.395	3.1E-02	5.201	0.286	4.369
Dryer (F-1)	1	1.200	1.200	10.51	1.0E-02	0.040	3.2E-03	0.526	0.029	0.442
Drying Oven for EU-02	1	3.500	3.500	30.66	2.9E-02	0.117	9.2E-03	1.533	0.084	1.288
Totals	97		16.58		0.138	0.552	0.044	7.260	0.399	6.098

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

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

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

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

Methodology

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

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

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

All emission factors are based on normal firing.

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

Abbreviations

PM = Particulate Matter

NOx = Nitrous Oxides

DCB = Dichlorobenzene

Cr = Chromium

PM10 = Particulate Matter (<10 um)

VOC = Volatile Organic Compounds

Pb = Lead

Mn = Manganese

SO2 = Sulfur Dioxide

CO = Carbon Monoxide

Cd = Cadmium

Ni = Nickel



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Holly Allen
Robert Weed Plywood Corp.
PO Box 487
Bristol IN 46507-0487

DATE: Oct. 26, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
MSOP
039-27968-00178

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Matthew Bunner VP Ops Robert Weed Plywood Corp.
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027
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Oct. 26, 2009

TO: Bristol Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Robert Weed Plywood Corp.
Permit Number: 039-27968-00178

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	BMILLER 10/26/2009 Robert Weed Plywood Corp. 039-27968-00178 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Holly Allen Robert Weed Plywood Corp. PO Box 487 Bristol IN 46507-0487 (Source CAATS) <i>Via Confirmed Delivery</i>									
2		Mathew Bunner VP Of Ops Robert Weed Plywood Corp. PO Box 487 Bristol IN 46507-0487 (RO CAATS)									
3		Thomas B. Kulesia PO Box 335 Bristol IN 46507 (Affected Party)									
4		Mary Lou Limited PTR Niblock Excavating, inc. PO Box 211 Bristol IN 46507 (Affected Party)									
5		Bristol Washington Twp Public Library P O Box 789 Bristol IN 46507-9464 (Library)									
6		Mr. Del Prete Donato 2501 Waterbend Drive Elkhart IN 46515-1455 (Affected Party)									
7		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
8		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
9		American Legion Post 143 905 Maple Street Bristol IN 46507 (Affected Party)									
10		Bristol Town Council and Town Manager P.O. Box 122 Bristol IN 46507 (Local Official)									
11		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
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