



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 3, 2009

RE: Indiana Veneers / 097 - 28358 - 00031

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 Renewal OFFICE OF AIR QUALITY

**Indiana Veneers Corporation  
1121 East 24th Street  
Indianapolis, Indiana 46205**

(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.: M097-28358-00031	
Issued by:  Alfred C. Dumaul, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 3, 2009 Expiration Date: December 3, 2019

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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)]

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The Permittee owns and operates a stationary hardwood veneer manufacture source.

Source Address:	1121 East 24th Street, Indianapolis, Indiana 46205
Mailing Address:	1121 East 24th Street, Indianapolis, Indiana 46205
General Source Phone Number:	(317) 926-2458
SIC Code:	2435
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) wood waste fired boiler, using natural gas as backup constructed in January of 1989, identified as 001, with a maximum heat input of 14.11 million British thermal units per hour (MM Btu/hr), with a maximum capacity of 0.39 tons of wood waste per hour, and exhausting to stack S004.
- (b) One (1) debarking operation, constructed in 1989, identified as 002, with a maximum capacity of 1,875 board feet (bdft) per hour (4.3 tons of logs per hour), sending scrap bark to dumpster, and exhausting to the atmosphere.
- (c) One (1) saw mill hog, constructed in 1989, identified as 003, with a maximum capacity of 1,875 board feet (bdft) per hour (4.3 tons of logs per hour), with particulate emissions controlled by cyclone 1, and exhausting to stack S001.
- (d) One (1) planing area, constructed in 1990, identified as 004, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (e) Two (2) split saws, constructed in 1979 and 1982, identified as 005 and 006, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (f) One (1) production hog, constructed in 1978, identified as 007, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (g) One (1) silo, constructed in 1979, identified as 008, fed by three (3) cyclones, supplying wood waste to the boiler, and exhausting to the stack S004.

- (h) One (1) clipping line hog, constructed in 2007, identified as 009, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 3, and exhausting to stack S003.
- (i) Four (4) veneer dryers, using heat from the boiler, constructed in 1994, 1996, 2000 and 2001, identified as 010A, 010B, 010C and 010D, each with a maximum capacity of 187.5 board feet (bdft) per hour (15.625 ft<sup>2</sup>/hour), and exhausting to the atmosphere or indoors.
- (j) Paved roads and parking lots.

## **SECTION B GENERAL CONDITIONS**

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

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

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

- 
- (a) This permit, M097-28358-00031, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability**

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

### **B.5 Severability**

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

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

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

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

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

#### B.8 Certification

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

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

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

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

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) All terms and conditions of permits established prior to M097-28358-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 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]**

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
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]**

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(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management  
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**

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

**B.16 Inspection and Entry**

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

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

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(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
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]**

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- (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]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 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.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.6 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.7 Performance Testing [326 IAC 3-6]**

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

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

Indiana Department of Environmental Management  
Compliance 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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

### **C.9 Compliance Monitoring [326 IAC 2-1.1-11]**

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

### **C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

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- (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.12 Response to Excursions or Exceedances**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; 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.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

**C.14 Malfunctions Report [326 IAC 1-6-2]**

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

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

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

**C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (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) 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:

- (a) One (1) wood waste fired boiler, using natural gas as backup constructed in January of 1989, identified as 001, with a maximum heat input of 14.11 million British thermal units per hour (MM Btu/hr), with a maximum capacity of 0.39 tons of wood waste per hour, and exhausting to stack S004.
- (b) One (1) debarking operation, constructed in 1989, identified as 002, with a maximum capacity of 1,875 board feet (bdft) per hour (4.3 tons of logs per hour), sending scrap bark to dumpster, and exhausting to the atmosphere.
- (c) One (1) saw mill hog, constructed in 1989, identified as 003, with a maximum capacity of 1,875 board feet (bdft) per hour (4.3 tons of logs per hour), with particulate emissions controlled by cyclone 1, and exhausting to stack S001.
- (d) One (1) planing area, constructed in 1990, identified as 004, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (e) Two (2) split saws, constructed in 1979 and 1982, identified as 005 and 006, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (f) One (1) production hog, constructed in 1978, identified as 007, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (g) One (1) silo, constructed in 1979, identified as 008, fed by three (3) cyclones, supplying wood waste to the boiler, and exhausting to the stack S004.
- (h) One (1) clipping line hog, constructed in 2007, identified as 009, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 3, and exhausting to stack S003.
- (i) Four (4) veneer dryers, using heat from the boiler, constructed in 1994, 1996, 2000 and 2001, identified as 010A, 010B, 010C and 010D, each with a maximum capacity of 187.5 board feet (bdft) per hour (15.625 ft<sup>2</sup>/hour), and exhausting to the atmosphere or indoors.
- (j) Paved roads and parking lots.

(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] [326 IAC 6.5-1-2] [326 IAC 6.5-6-22]

- (a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited by the following:

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

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

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

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type	Maximum Particulate Emissions before control (lb/hour)
Sawmill Hog	4.29	10.88	1.50
Production Hog	0.39	2.18	0.14
Clipping Line Hog	0.39	2.18	0.14

- (b) Pursuant to 326 IAC 6.5-6-22, the source, identified as Indiana Veneers Corporation, shall meet the following emission limit:

Source	Process	Emission Limits	
		tons/yr	lbs/million Btu
Indiana Veneers Corporation	Boiler	13.9	0.330

**D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

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

**D.1.3 Record Keeping Requirement**

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: Indiana Veneers Corporation  
Source Address: 1121 East 24th Street, Indianapolis, Indiana 46205  
Mailing Address: 1121 East 24th Street, Indianapolis, Indiana 46205  
MSOP No.: M097-28358-00031

**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:



### 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:

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Indiana Veneers Corporation</b>
<b>Source Location:</b>	<b>1121 East 24th Street, Indianapolis, IN 46205</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>2435</b>
<b>Permit Renewal No.:</b>	<b>M097-28358-00031</b>
<b>Permit Reviewer:</b>	<b>Sarah Conner, Ph. D.</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Indiana Veneers Corporation relating to the operation of a hardwood veneer manufacture source.

**History**

On August 18, 2009, Indiana Veneers Corporation submitted an application to the OAQ requesting to renew its operating permit. Indiana Veneers Corporation was issued a Minor Source Operating Permit (MSOP) No. M097-17957-00031 on October 17, 2003.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) wood waste fired boiler, using natural gas as backup, constructed in January of 1989, identified as 001, with a maximum heat input of 14.11 million British thermal units per hour (MM Btu/hr), with a maximum capacity of 0.39 tons of wood waste per hour, and exhausting to stack S004.

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

The source also consists of the following emission units that were constructed and/or is operating without a permit:

- (b) One (1) debarking operation, constructed in 1989, identified as 002, with a maximum capacity of 1,875 board feet (bdft) per hour (4.3 tons of logs per hour), sending scrap bark to dumpster, and exhausting to the atmosphere.
- (c) One (1) saw mill hog, constructed in 1989, identified as 003, with a maximum capacity of 1,875 board feet (bdft) per hour (4.3 tons of logs per hour), with particulate emissions controlled by cyclone 1, and exhausting to stack S001.
- (d) One (1) planing area, constructed in 1990, identified as 004, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (e) Two (2) split saws, constructed in 1979 and 1982, identified as 005 and 006, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.
- (f) One (1) production hog, constructed in 1978, identified as 007, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 2, and exhausting to stack S002.

- (g) One (1) silo, constructed in 1979, identified as 008, fed by three (3) cyclones, supplying wood waste to the boiler, and exhausting to the stack S004.
- (h) One (1) clipping line hog, constructed in 2007, identified as 009, generating a maximum capacity of 0.39 tons of wood scrap per hour, with particulate emissions controlled by cyclone 3, and exhausting to stack S003.
- (i) Four (4) veneer dryers, using heat from the boiler, constructed in 1994, 1996, 2000 and 2001, identified as 010A, 010B, 010C and 010D, each with a maximum capacity of 187.5 board feet (bdft) per hour (15.625 ft<sup>2</sup>/hour), and exhausting to the atmosphere or indoors.
- (j) Paved roads and parking lots.

### Existing Approvals

Since the issuance of the MSOP (M097-17957-00031) on October 17, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Notice-Only Change No. (097-19418-00031) issued on August 09, 2004.

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

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

- (a) Sections D.1.3 (Particulate Matter), D.1.4 (Cyclone Inspections), D.1.5 (Cyclone Failure Detection), D.1.6 (Visible Emission Notations) from permit M097-17957-00031, issued on October 17, 2003, have been removed from the permit renewal because the cyclones are not required to operate for the source to be in compliance with any state rule.
- (a) Section D.1.7 (Record Keeping Requirements) from permit M097-17957-00031, issued on October 17, 2003, has been revised because visible emission notations are not required; therefore, records of visible emission notations are not needed.

### Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit".

- (a) Pursuant to the woodworking ruling from 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 calculations from the sawmill operations show that the unlisted units would be exempt due to this ruling (see appendix A for calculations). Because these units are exempt, no enforcement action is required by IDEM.

- (b) The Permittee was required to apply for an operation permit renewal at least ninety (90) days prior to the expiration pursuant to the compliance schedule contained in 326 IAC 2-6.1-7(a) and listed under section B.4 of permit M097-17957-00031, issued on October 17, 2003. Therefore, the source should have applied for an MSOP renewal prior to July 19, 2008. On August 18, 2009, IDEM, OAQ received an application for a Minor Source Operating Permit (MSOP) renewal from Indiana Veneers Corporation. IDEM is reviewing this matter and will take the appropriate action.

This proposed approval is intended to satisfy the requirements of the construction permit rules and the requirements of the operating permit rules.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

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.

**County Attainment Status**

The source is located in Marion County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Attainment effective November 8, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> .	

- (a) Ozone Standards
  - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) 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. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**  
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Marion 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.
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### **Unrestricted Potential Emissions**

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

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

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### **Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standards for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 CFR

60.40, Subpart Db), are not included in the permit for the boiler, identified as 001, because it is rated at less than one hundred (100) MMBtu per hour.

- (b) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40, Subpart Dc), are not included in the permit for the boiler, identified as 001, because construction of this unit commenced prior to June 9, 1989.
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

#### **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.

#### **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.

#### **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.

#### **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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

#### **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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

**State Rule Applicability – Individual Facilities**

Boiler

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The requirements of 326 IAC 6-2-4 do not apply to the boiler, identified as 001, because the boiler, identified as 001, is subject to the more stringent particulate limit set forth in 326 IAC 6.5.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-6-22, the source, identified as Indiana Veneers Corporation, shall meet the following emission limit:

Source	Process	Emission Limits	
		tons/yr	lbs/million Btu
Indiana Veneers Corporation	Boiler	13.9	0.330

Based on Appendix A, the potential to emit of particulate from the boiler, identified as 001, constructed after September 21, 1983, is 8.26 tons per year.

$$\text{For Boiler 001 } 8.26 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 1.89 \text{ lbs/hr}$$
$$(1.89 \text{ lbs/hr} / 14.11 \text{ MMBtu/hr}) = 0.13 \text{ lbs PM per MMBtu}$$

Therefore, boiler, identified as 001, will be able to comply with the requirements of to 326 IAC 6.5-6-22.

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

The boiler, identified as 001, is exempt from the requirements of 326 IAC 6-3 since it is a source indirect heating.

326 IAC 7-1.1-1 (Sulfur Dioxide Emissions Limitations)

The requirements of 326 IAC 7-1.1 are not applicable to the boiler, identified as 001, because the potential to emit sulfur dioxide (SO<sub>2</sub>) from the boiler is less than ten (10) pounds per hour and twenty-five (25) tons per year.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The boiler, identified as 001, is not subject to the requirements of 326 IAC 8-1-6, since the uncontrolled VOC potential emissions for VOC from the boiler is less than twenty-five (25) tons per year.

Woodworking

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited by the following:

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

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

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

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type	Maximum Particulate Emissions before control (lb/hour)
Sawmill Hog	4.29	10.88	1.50
Production Hog	0.39	2.18	0.14
Clipping Line Hog	0.39	2.18	0.14

The one (1) debarking operation has potential particulate emissions less than 0.551 lbs per hour. Therefore, pursuant to 326 IAC 6-3-1(14), the one (1) debarking operation is not subject to the requirements of 326 IAC 6-3.

The four (4) veneer dryers each have potential particulate emissions less than 0.551 lbs per hour. Therefore, pursuant to 326 IAC 6-3-1(14), the four (4) veneer dryers are not subject to the requirements of 326 IAC 6-3.

The potential to emit particulate from the sawmill hog, production hog and clipping line hog are less than the 326 IAC 6-3 allowable emissions rate; therefore, the sawmill hog, production hog and clipping line hog are able to comply with 326 IAC 6-3 without the use of control devices.

#### 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

The woodworking operations at the source are not subject to the requirements of 326 IAC 6.5-1-1(a)(2) because they have potential particulate emissions less than 100 tons per year and actual particulate emissions less than 10 tons per year.

#### Compliance Determination and Monitoring Requirements

There are no compliance monitoring requirements or record keeping requirements applicable to this source.

#### Recommendation

The staff recommends to the Commissioner that MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 18, 2009. Additional information was received on September 11, 2009 and September 16, 2009.

#### Conclusion

The operation of this hardwood veneer manufacture source shall be subject to the conditions of the attached MSOP Renewal No. M097-28358-00031.

**Appendix A: Summary**

**Company Name:** Indiana Veneers Corporation  
**Address City IN Zip:** 1121 East 24th Street, Indianapolis, IN  
**Permit Number:** M097-28358-00031  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 9/15/2009

	<b>**Uncontrolled PTE (tons/yr)</b>								
	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Worst Case Single HAP</b>	<b>Total HAPs</b>
wood waste fired boiler	8.26	8.26	8.26	1.55	30.28	1.05	5.64	1.17 (Hydrogen Chloride)	2.07
*Sawmill Operations	1.15	0.65	0.65	-	-	-	-	-	-
Four (4) Veneer Dryers	-	-	-	-	-	0.034	0.004	0.017 (Methanol)	0.005
Paved Roads	0.033	0.006	0.001	-	-	-	-	-	-
<b>Total</b>	<b>9.44</b>	<b>8.91</b>	<b>8.91</b>	<b>1.55</b>	<b>30.28</b>	<b>1.08</b>	<b>5.64</b>	<b>1.17 (Hydrogen Chloride)</b>	<b>2.08</b>

\*The particulate controls (cyclones) are considered an integral part of the sawmill operations, therefore emissions are shown after control. See next page for additional details.

\*\*Uncontrolled emissions are equal to controlled emissions.

**Appendix A: Emissions Calculations  
Sawmill Operations**

**Company Name: Indiana Veneers Corporation  
Address City IN Zip: 1121 East 24th Street, Indianapolis, IN  
Permit Number: M097-28358-00031  
Reviewer: Sarah Conner, Ph. D.  
Date: 9/15/2009**

Process	Throughput (BDFT/hr)	Throughput (cubic feet/hr)	Density of Wood (lbs/cubic foot)	Throughput (tons/hr)	Particulate Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	Uncontrolled Particulate Emissions (lbs/hr)	Uncontrolled PM10 Emissions (lbs/hr)	Uncontrolled Particulate Emissions (tons/yr)	Uncontrolled PM10 Emissions (tons/yr)	Uncontrolled PM2.5* Emissions (tons/yr)	Controlled Particulate Emissions (tons/yr)	Controlled PM10 Emissions (tons/yr)	Controlled PM2.5* Emissions (tons/yr)
Debarking	1,875	156.25	54.9	4.289	0.02	0.011	0.086	0.047	0.376	0.207	0.207	0.38	0.21	0.21
**Sawmill Hog	1,875	156.25	54.9	4.289	0.35	0.2	1.501	0.858	6.575	3.757	3.757	0.66	0.38	0.38
**Production Hog	N/A	N/A	N/A	0.39	0.35	0.2	0.136	0.078	0.597	0.341	0.341	0.06	0.03	0.03
**Clipping Line Hog	N/A	N/A	N/A	0.39	0.35	0.2	0.136	0.078	0.597	0.341	0.341	0.06	0.03	0.03
<b>Total</b>									<b>8.145</b>	<b>4.646</b>	<b>4.646</b>	<b>1.153</b>	<b>0.651</b>	<b>0.651</b>

**METHODOLOGY**

1 board foot (BDFT) = 1/12 cubic foot

The throughput in BDFT/hr was extrapolated assuming that 15,000 BDFT/ 8 hours is the maximum capacity.

Throughput (cubic feet/hr) = Throughput (BDFT/hr) / (12 BDFT / cubic foot)

Density of Wood: Assume worst case wood -- white oak with a specific gravity of 0.88 (Wood Handbook, Wood as an Engineering Material, USDA Forest Service) x density of water (62.39 lbs/cu ft)

Throughput (tons/hr) = Throughput (cubic feet/hr) x Density of Wood (lbs/cubic foot) / (1 ton/2000 lbs)

Throughput of scrap from Production Hog and Clipping Line Hog is about 18702 lbs scrap per day = 18702 lb / 1 day \* (1 day / 24 hrs) \* (1 ton / 2000 lbs)

Emission Factors from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Pollutants, March 1990 (SCC 3-07-008-01 and 02)

Emissions (lbs/hr) = Throughput (tons/hr) x Emission Factor (lbs/ton)

Emissions (tons/yr) = Emissions (lbs/hr) x (8,760 hours/year) / (2,000 lbs/ton)

\*Assume that PM2.5 is equal to PM10.

\*\*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.

**Appendix A: Emission Calculations  
Emissions From the Four (4) Veneer Dryers**

**Company Name: Indiana Veneers Corporation**  
**Address City IN Zip: 1121 East 24th Street, Indianapolis, IN**  
**Permit Number: M097-28358-00031**  
**Reviewer: Sarah Conner, Ph. D.**  
**Date: 9/15/2009**

The veneer dryers use process heat generated by the wood boiler and gas boiler.

Emission Unit ID	Throughput per dryer (BDFT/hr)	Combined Throughput Rate (ft <sup>2</sup> /hr)	*VOC Emission Factor (lbs/1,000 ft <sup>2</sup> )	CO Emission Factor (lbs/1,000 ft <sup>2</sup> )	PTE of VOC (tons/year)	PTE of CO (tons/year)
Four (4) Veneer Dryers	187.5	1.953	1.000	0.108	<b>0.034</b>	<b>0.004</b>

Emission Unit ID	Throughput per dryer (BDFT/hr)	Combined Throughput Rate (ft <sup>2</sup> /hr)	Acetaldehyde Emission Factor (lbs/1,000 ft <sup>2</sup> )	Formaldehyde Emission Factor (lbs/1,000 ft <sup>2</sup> )	Methanol Emission Factor (lbs/1,000 ft <sup>2</sup> )	Methyl isobutyl ketone Emission Factor (lbs/1,000 ft <sup>2</sup> )	Phenol Emission Factor (lbs/1,000 ft <sup>2</sup> )	Total HAPs Emission Factor (lbs/1,000 ft <sup>2</sup> )
**Four (4) Veneer Dryers	187.5	1.953	0.036	0.008	0.062	0.031	0.003	0.140
		HAPs PTE (tons/year)	<b>0.001</b>	<b>2.60E-04</b>	<b>0.002</b>	<b>0.001</b>	<b>1.03E-04</b>	<b>0.005</b>

Emission factors for VOC, CO and HAPs are from AP 42, Chapter 10.5-6, Tables 10.5-2 and 10.5-3 (SCC 3-07-007-56, 3-07-007-57) (1/02).

In Tables 10.5-2 and -3, separate emission factors also are presented for the heated zones and cooling section of a veneer dryer. When estimating total emissions from the drying process, emissions from heated zones and cooling section should be combined.

\*VOC as propane

\*\*The emissions of particulate from the indirect heated veneer dryers are negligible. AP 42 lists no emission factors for hardwood veneer dryers. Emissions from hardwood veneer dryers are qualitatively different in type and amount from the emissions from softwood dryers used in the plywood industry (40 CFR 63.2264(b)). Testing on similar hardwood veneer dryers in Indiana revealed no particulate emissions.

**Methodology**

1 board foot (BDFT) = 1/12 cubic foot

The throughput in BDFT/hr was extrapolated assuming that 1,500 BDFT/ 8 hours is the maximum capacity.

Throughput (cubic feet/hr) = Throughput (BDFT/hr) / (12 BDFT / cubic foot)

PTE (tons/year) = Throughput Rate (ft<sup>2</sup>/day) x Emission Factor (lbs/1,000 ft<sup>2</sup>) x 1/1,000 ft<sup>2</sup> x 365 days/year x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
External Combustion Boiler  
Wood Waste Combustion  
Dry Wood**

**Company Name: Indiana Veneers Corporation  
Address City IN Zip: 1121 East 24th Street, Indianapolis, IN  
Permit Number: M097-28358-00031  
Reviewer: Sarah Conner, Ph. D.  
Date: 9/15/2009**

Maximum Capacity (MMBtu/hr)	14.11
Actual Capacity (tons/hr)	0.39
Higher Heating Value of Fuel (Btu/lb)	8610
Converted Capacity in MMBtu/hr	6.71

Uncontrolled PTE							
Emission Factor in lb/MMBtu	Pollutant						
	PM*	PM10*	PM2.5*	SO <sub>2</sub> **	NO <sub>x</sub> **	VOC**	CO*
	0.1336	0.1336	0.1336	0.025	0.49	0.017	0.0912
Potential Emissions in tons/yr	8.26	8.26	8.26	1.55	30.28	1.05	5.64

**Methodology**

Actual Capacity = 18702 lbs scrap per day = 18702 lb / 1 day \* (1 day / 24 hrs) \* (1 ton / 2000 lbs)

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu) x 2000 lbs/1 ton

\*PM and CO emission factors based on stack test data from July 17, 1990 pursuant to permit MSOP 097-17957-00031, issued October 17, 2003. A copy of the July 17, 1990 stack test was received on October 2, 2009. In addition, it was assumed that PM10 and PM2.5 are equal to PM.

\*\*SO<sub>2</sub>, NO<sub>x</sub>, and VOC emission factors for Dry wood based on AP-42, Chapter 1.6.

AP-42 emission factors are found in Chapter 1.6, tables 1.6-1 and 1.6-2 (revised 9/03), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

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

**Appendix A: HAPs Emissions Calculations  
External Combustion Boiler  
Wood Waste Combustion (uncontrolled)  
All Wood Waste Fuel Types**

**Company Name: Indiana Veneers Corporation  
Address City IN Zip: 1121 East 24th Street, Indianapolis, IN  
Permit Number: M097-28358-00031  
Reviewer: Sarah Conner, Ph. D.  
Date: 9/15/2009**

Maximum Capacity (MMBtu/hr)	14.11
Actual Capacity (tons/hr)	0.39
Higher Heating Value of Fuel (Btu/lb)	8610
Converted Capacity in MMBtu/hr	6.7158

	Uncontrolled HAPs PTE					
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Total
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03	
Potential Emissions in tons/yr	0.247	0.260	0.272	1.174	0.117	2.070

**Methodology**

To convert from tons/hr capacity to MMBtu/hr capacity:

$$\text{Heat Input Capacity (MMBtu/hr)} = \text{Capacity (tons/hr)} \times \text{Higher Heating Value of wood fuel (Btu/lb)} \times (1 \text{ MMBtu}/106 \text{ Btu}) \times 2000 \text{ lbs}/1 \text{ ton}$$

AP-42 emission factors are found in Chapter 1.6, table 1.6-3 (revised 9/03), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

$$\text{Emissions (tons/yr)} = \text{Capacity (MMBtu/hr)} \times \text{Emission Factor (lb/MMBtu)} \times 8760\text{hrs/yr} \times 1\text{ton}/2000\text{lbs}$$

Only the five highest AP-42 HAPs emission factors are shown.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Indiana Veneers Corporation  
Address City IN Zip: 1121 East 24th Street, Indianapolis, IN  
Permit Number: M097-28358-00031  
Reviewer: Sarah Conner, Ph. D.  
Date: 9/15/2009**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

14.1  
for boiler 001

123.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO <sub>2</sub>	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.12	0.47	0.47	0.04	6.18	0.34	5.19

\*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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 HAPs Emissions**

**Company Name: Indiana Veneers Corporation  
 Address City IN Zip: 1121 East 24th Street, Indianapolis, IN  
 Permit Number: M097-28358-00031  
 Reviewer: Sarah Conner, Ph. D.  
 Date: 9/15/2009**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.298E-04	7.416E-05	0.005	0.111	2.101E-04

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total
Potential Emission in tons/yr	3.090E-05	6.798E-05	8.652E-05	2.348E-05	1.298E-04	0.117

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

Company Name: Indiana Veneers Corporation  
Address City IN Zip: 1121 East 24th Street, Indianapolis, IN  
Permit Number: M097-28358-00031  
Reviewer: Sarah Conner, Ph. D.  
Date: 9/15/2009

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip) loaded	4.0	1.0	4.0	35.5	142.0	100	0.019	0.1	27.7
Vehicle (leaving plant) (one-way trip) empty	4.0	1.0	4.0	13.0	52.0	100	0.019	0.1	27.7
Vehicle (entering plant) (one-way trip) empty	2.0	1.0	2.0	13.0	26.0	100	0.019	0.0	13.8
Vehicle (leaving plant) (one-way trip) loaded	2.0	1.0	2.0	35.5	71.0	100	0.019	0.0	13.8
<b>Total</b>			<b>12.0</b>		<b>291.0</b>			<b>0.2</b>	<b>83.0</b>

Average Vehicle Weight Per Trip =  $\frac{24.3}{0.02}$  tons/trip  
Average Miles Per Trip =  $\frac{24.3}{0.02}$  miles/trip

Unmitigated Emission Factor, Ef =  $[k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	24.3	24.3	24.3	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \*  $[1 - (p/4N)]$

Mitigated Emission Factor, Eext =  $Ef * [1 - (p/4N)]$   
where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N =  $\frac{365}{365}$  days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.86	0.17	0.02	lb/mile
Mitigated Emission Factor, Eext =	0.79	0.15	0.02	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip) loaded	0.01	0.00	0.00	0.01	0.00	0.00
Vehicle (leaving plant) (one-way trip) empty	0.01	0.00	0.00	0.01	0.00	0.00
Vehicle (entering plant) (one-way trip) empty	0.01	0.00	0.00	0.01	0.00	0.00
Vehicle (leaving plant) (one-way trip) loaded	0.01	0.00	0.00	0.01	0.00	0.00
	<b>0.036</b>	<b>0.007</b>	<b>0.001</b>	<b>0.033</b>	<b>0.006</b>	<b>0.001</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particle Matter (<2.5 um)  
PTE = Potential to Emit

**Appendix A: 326 IAC 6-3-2 Compliance  
Summary**

**Company Name:** Indiana Veneers Corporation  
**Address City IN Zip:** 1121 East 24th Street, Indianapolis, IN  
**Permit Number:** M097-28358-00031  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 9/15/2009

	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr) for each unit of that type	Emission factor (lb/ton)	Max PTE Particulate (lb/hour)
Debarking	4.29	10.88	0.02	0.09
Sawmill Hog	4.29	10.88	0.35	1.50
Production Hog	0.39	2.18	0.35	0.14
Clipping Line Hog	0.39	2.18	0.35	0.14
*Veneer Dryers	-	-	-	negligible

\*The emissions of particulate from the indirect heated veneer dryers are negligible. AP 42 lists no emission factors for hardwood veneer dryers. Emissions from hardwood veneer dryers are qualitatively different in type and amount from the emissions from softwood dryers used in the plywood industry (40 CFR 63.2264(b)). Testing on similar hardwood veneer dryers in Indiana (see F081-12122-00014) revealed no particulate emissions.

The four (4) veneer dryers each have potential particulate emissions less than 0.551 lbs per hour. Therefore, pursuant to 326 IAC 6-3-1(14), the four (4) veneer dryers are not subject to the requirements of 326 IAC 6-3.



# 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](http://www.idem.IN.gov)

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

**TO:** Werner Lorenz  
Indiana Veneers  
1121 E 24th St  
Indianapolis, IN 46205

**DATE:** December 3, 2009

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

**SUBJECT:** Final Decision  
MSOP - Renewal  
097 - 28358 - 00031

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:  
Marvin Frank Frank & Kraft  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

December 3, 2009

TO: Indianapolis Central Library Branch

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

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

**Applicant Name: Indiana Veneers**  
**Permit Number: 097 - 28358 - 00031**

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	LPOGOST 12/3/2009 Indiana Veneers 097 - 28358 - 00031 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
3		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)									
4		Indianapolis Central Library Branch 40 East St. Clair Street Indianapolis IN 46204 (Library)									
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
7		Ms. Janet McCabe Improving Kids Environment 3951 N Meridian Street Suite 160 Indianapolis IN 46208-4062 (Affected Party)									
8		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)									
9		Marvin Frank Frank & Kraft 135 N. Pennsylvania, Suite 1100 Indianapolis IN 46204 (Consultant)									
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