INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Michael R. Pence
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: April 18, 2013

RE: Pike Lumber Company - Milan/137-32725-00024

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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New Source Construction and Minor Source Operating Permit

OFFICE OF AIR QUALITY

Pike Lumber Company – Milan
785 East Carr Street
Milan, Indiana 47031

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 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.: M137-32725-00024	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 18, 2013 Expiration Date: April 18, 2018

TABLE OF CONTENTS

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 stationary sawmill and lumber site.

Source Address:	785 East Carr Street, Milan, Indiana 47031
General Source Phone Number:	574-893-4511
SIC Code:	2421
County Location:	Ripley
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) sawmill operation, identified as SAW, constructed in June 2010, with a maximum capacity of 4213 BDFT per hour, consisting of one (1) head saw, three (3) edger saws, and eleven (11) trimmer saws, using no control devices, and exhausting indoors.

(b) One (1) debarker, identified as DBK, with a maximum capacity of 4213 BDFT per hour, constructed in June 2010, using no control device, and exhausting indoors.

(c) One (1) chipper, identified as CHIP, with a maximum capacity of 3.15 tons per hour, constructed in June 2010, using cyclone C-1 as a control device, exhausting indoors.

(d) One (1) sawdust handling operation, identified as DUST, with a maximum capacity of 0.66 tons per hour, constructed in June 2010, using no control device, exhausting indoors. The sawdust is collected throughout the mill with a vibrating open conveyor system. Then it enters an enclosed auger system and is blown into a truck via a closed blower system.

(e) One (1) dip coating operation, identified as DIP, with a maximum capacity of 0.21 gallons per hour, constructed in June 2010. This process uses a mixture of water, insecticides, and fungicides to treat lumber.

(f) One (1) lumber waxing operation, identified as WAX, with a maximum capacity of 0.37 gallons per hour, constructed in June 2010. This process sprays a non-volatile wax coating on the ends of boards of lumber.

(g) One (1) natural gas-fired boiler, identified as NG-B, with a maximum heat input capacity of 0.85 MMBtu per hour, constructed in June 2010.

(h) Unpaved roads and parking lots.

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, M137-32725-00024, 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.5 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.6 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.7 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.8 Property Rights or Exclusive Privilege

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

B.9 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. 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.10 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, Indiana 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.11 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) no later than 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 Permittee shall implement the PMPs.

(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.

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

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M137-32725-00024 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.13 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.14 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 an affirmation that the statements in the application are true and complete 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 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.18 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 an affirmation that the statements in the application are true and complete 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.19 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than 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.20 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 construct and 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 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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.

(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) For performance testing required by this permit, 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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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 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.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning 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 normal or usual manner of operation.

(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 record the reasonable response steps taken.

C.13 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

C.14 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.15 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 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) 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:

(a) One (1) sawmill operation, identified as SAW, constructed in June 2010, with a maximum capacity of 4213 BDFT per hour, consisting of one (1) head saw, three (3) edger saws, and eleven (11) trimmer saws, using no control devices, and exhausting indoors.

(b) One (1) debarker, identified as DBK, with a maximum capacity of 4213 BDFT per hour, constructed in June 2010, using no control device, and exhausting indoors.

(c) One (1) chipper, identified as CHIP, with a maximum capacity of 3.15 tons per hour, constructed in June 2010, using cyclone C-1 as a control device, exhausting indoors.

(d) One (1) sawdust handling operation, identified as DUST, with a maximum capacity of 0.66 tons per hour, constructed in June 2010, using no control device, exhausting indoors. The sawdust is collected throughout the mill with a vibrating open conveyor system. Then it enters an enclosed auger system and is blown into a truck via a closed blower system.

(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]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the sawmill operations (SAW) shall not exceed 18.71 pounds per hour, when operating at a process weight rate of 9.64 tons per hour.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from each segment of the sawdust handling system (DUST) shall not exceed 3.10 pounds per hour, when operating at a process weight rate of 0.66 tons per hour.

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

Interpolation of the data for the process weight rate up to 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

Compliance Determination Requirements

D.1.2 Particulate Control [326 IAC 6-3-2]

In order to ensure that the chipper (CHIP) is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), cyclone C-1 controlling particulate emissions from the chipper (CHIP) shall be in operation and control emissions from the chipper (CHIP) at all times that the chipper (CHIP) is in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(g) One (1) natural gas-fired boiler, identified as NG-B, with a maximum heat input capacity of 0.85 MMBtu per hour, constructed in June 2010.

(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 Particulate [326 IAC 6-2]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) emissions from the natural gas-fired boiler (NG-B) shall not exceed 0.6 pound per MMBtu heat input.

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:	Pike Lumber Company – Milan
Address:	785 East Carr Street
City:	Milan, Indiana 47031
Phone #:	574-893-4511
MSOP #:	M137-32725-00024

I hereby certify that Pike Lumber Company – Milan is : ☐ still in operation.
☐ no longer in operation.

I hereby certify that Pike Lumber Company – Milan is : ☐ in compliance with the requirements of MSOP M137-32725-00024.
☐ not in compliance with the requirements of MSOP M137-32725-00024.

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
COMPLIANCE AND ENFORCEMENT BRANCH
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:

_____
_____

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

Pike Lumber Company – Milan
785 East Carr Street
Milan, Indiana 47031

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Pike Lumber Company – Milan 785 East Carr Street, Milan, Indiana 47031, completed construction of the stationary sawmill and lumber site on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on January 9, 2013 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M137-32725-00024, Plant ID No. 137-00024 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	**Pike Lumber Company – Milan**
Source Location:	**785 East Carr Street, Milan, IN 47301**
County:	**Ripley**
SIC Code:	**2421 (Sawmills and Planing Mills, General)**
Operation Permit No.:	**M137-32725-00024**
Permit Reviewer:	**Dominic Williams**

On January 9, 2013, the Office of Air Quality (OAQ) received an application from Pike Lumber Company – Milan related to the construction and continued operation of an existing stationary sawmill and lumber site.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Ripley County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for 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. Ripley 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) $PM_{2.5}$
Ripley County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2

emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Ripley 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.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

(a) One (1) sawmill operation, identified as SAW, constructed in June 2010, with a maximum capacity of 4213 BDFT per hour, consisting of one (1) head saw, three (3) edger saws, and eleven (11) trimmer saws, using no control devices, and exhausting indoors.

(b) One (1) debarker, identified as DBK, with a maximum capacity of 4213 BDFT per hour, constructed in June 2010, using no control device, and exhausting indoors.

(c) One (1) chipper, identified as CHIP, with a maximum capacity of 3.15 tons per hour, constructed in June 2010, using cyclone C-1 as a control device, exhausting indoors.

(d) One (1) sawdust handling operation, identified as DUST, with a maximum capacity of 0.66 tons per hour, constructed in June 2010, using no control device, exhausting indoors. The sawdust is collected throughout the mill with a vibrating open conveyor system. Then it enters an enclosed auger system and is blown into a truck via a closed blower system.

(e) One (1) dip coating operation, identified as DIP, with a maximum capacity of 0.21 gallons per hour, constructed in June 2010. This process uses a mixture of water, insecticides, and fungicides to treat lumber.

(f) One (1) lumber waxing operation, identified as WAX, with a maximum capacity of 0.37 gallons per hour, constructed in June 2010. This process sprays a non-volatile wax coating on the ends of boards of lumber.

(g) One (1) natural gas-fired boiler, identified as NG-B, with a maximum heat input capacity of 0.85 MMBtu per hour, constructed in June 2010.

(h) Unpaved roads and parking lots.

"Integral Part of the Process" Determination

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 from the chipper were calculated after consideration of the cyclone controls for determining operating permit level and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the chipper were calculated before consideration of the cyclone controls.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. 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.

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	36.20
PM10[(1)]	15.01
PM2.5	15.01
SO_2	0.002
NO_x	0.37
VOC	1.85
CO	0.31
GHGs as CO_2e	440.7

(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)
Hexane	6.6E-03
TOTAL HAPs	**6.6E-03**

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) 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) 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.

(c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since the natural gas-fired boiler (NG-B) has a heat input capacity of less than ten (10) MMBtu per hour.

(b) The requirements of the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12), are not included in the permit, since the natural gas-fired boiler is not a spark ignition internal combustion engine and does not meet the applicability criteria as specified in 40 CFR 60.4230.

(c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(d) The requirements of the National Emission Standards for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ, are not included in this permit, since this source does not manufacture wood furniture or wood furniture components as described in 40 CFR 63.801 and it is not a major source of HAPs. This source consists of a sawmill and dip coating process.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD (40 CFR 63.2230 through 63.2292), are not included in the permit, since this source does not perform plywood or composite wood products manufacturing and it is not a major source of HAPs. This source consists of a sawmill and dip coating process.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Wood Building Products, Subpart QQQQ (326 IAC 20-79), are not included in the permit for the surface coating operation, because even though this operation does coat wood building products, it is not located at a plant site that is a major source of HAPs as defined in 40 CFR part 63, subpart A, §63.2.

(g) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (63.7480 through 63.7575) (326 IAC 20-95) are not included in the permit, because this source is not a major source of HAPs.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the one (1) natural gas-fired boiler, identified as NG-B, since gas-fired boilers, as defined in 40 CFR 63.11237, are specifically exempted from this rule, as indicated in 40 CFR 63.11195(e).

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Preserving Area Sources, 40 CFR Part 63, Subpart QQQQQQ, are not included in the permit because the source is not a wood preserving operation as defined by 40 CFR 63.11433. Under 40 CFR 63.11433, "wood preserving" means the pressure or thermal impregnation of

chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. In the wood treating process at this source, no thermal or pressure techniques are used.

(j) 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)

(k) 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 criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO_2e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(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)
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.

(h) 326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

(i) 326 IAC 6.8 PM Emissions for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

(j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Sawmill Operations, Chipper, Debarker, and Sawdust Handling

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

(1) Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the debarker (DBK) or chipper (CHIP), since the potential to emit particulate emissions after integral woodworking controls is less than five hundred fifty-one thousandths (0.551) pound per hour.

In order to ensure that the chipper (CHIP) is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), cyclone C-1 controlling particulate emissions from the chipper (CHIP) shall be in operation and control emissions from the chipper (CHIP) at all times that the chipper (CHIP) is in operation.

(2) Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the sawmill operations (SAW) and the sawdust handling operation (DUST), since these operations have potential particulate emissions (after integral woodworking controls) greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the sawmill operations (SAW) and the sawdust handling operation (DUST) shall not exceed the pound per hour emission rate shown in the table below:

Process (**Unit ID**)	Maximum Process Weight (tons/hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)	Uncontrolled PM Emission factor* (lb/ton)	Uncontrolled PTE of PM (lbs/hr)	Is a Control Device Needed to Comply with 326 IAC 6-3-2?
Sawmill Operation (head **SAW**, edger, trimmer)	9.64	18.71	0.02	3.37	No
Sawdust handling (**DUST**)	0.66	3.10	1.00	0.66	No

These limitations were calculated using the following equation:

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

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

The potential particulate matter emissions before control for the sawmill operations (SAW) and the sawdust handling operation (DUST) are each less than the 326 IAC 6-3-2 allowable emission rates. Therefore, the sawmill operations (SAW) and the sawdust handling operation (DUST) are each able to comply with the 326 IAC 6-3 allowable emission rate without the use of particulate controls.

Dip Tank

(b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The dip tank is not subject to 326 IAC 6-3-2, because the dip tank is not a source of particulate emissions.

(c) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The dip tank is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Natural-Gas Fired Boiler (NG-B)

(d) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), the natural gas-fired Boiler NG-B (constructed in 2010, with a maximum heat input capacity of 0.85 MMBtu/hr) is subject to the requirements of 326 IAC 6-2-4, since it is a source of indirect heating that was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the natural gas-fired Boiler NG-B shall not exceed 0.6 pound per MMBtu heat input, because the maximum source operating capacity is less than 10 MMBtu per hour.

The AP-42 natural gas combustion emission factor for particulate matter (PM) is 0.00186 lb/MMBtu (1.9 lb/MMCF / 1020 MMBtu/MMCF), which is less than the 326 IAC 6-2-4 particulate emission limit of 0.6 MMBtu/hr for Boiler NG-B when burning natural gas. Therefore, Boiler NG-B is able to comply with the applicable 326 IAC 6-2-4 particulate emission limit without the use of a control device when burning natural gas.

(e) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired boiler is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

(f) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired boiler is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.

Compliance Determination, Monitoring and Testing Requirements

(a) There are no compliance monitoring or compliance determination requirements applicable to this source.

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 January 9, 2013.

The continued operation of this source shall be subject to the conditions of the attached proposed New Source Construction MSOP No. M137-32725-00024. The staff recommends to the Commissioner that this New Source Construction and New Source Review and MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Dominic Williams 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) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.

(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.in.gov/idem

Appendix A: Emission Calculations
Emissions Summary

Company Name: Pike Lumber Company – Milan
Source Address: 785 East Carr Street, Milan, Indiana 47031
Permit Number: M137-32725-00024
Reviewer: Dominic Williams

Unlimited Potential to Emit (tons/year) (Before Integral Woodworking Controls)

Emissions Unit	PM*	PM10*	PM2.5*	SO_2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Woodworking Operations*	20.45	11.67	11.67	-	-	-	-	-	-	-	-
Sawdust Handling	5.77	2.08	2.08	-	-	-	-	-	-	-	-
Dip Coating	-	-	-	-	-	1.83	-	-	0.0	-	-
Natural Gas Combustion	0.01	0.03	0.03	0.002	0.37	0.02	0.31	440.7	6.9E-03	6.6E-03	Hexane
Unpaved Roads	14.08	3.59	3.59	-	-	-	-	-	-	-	-
Waxing	-	-	-	-	-	0.0	-	-	0.0	-	-
Total	**40.30**	**17.36**	**17.36**	**0.002**	**0.37**	**1.85**	**0.31**	**440.7**	**0.0**	**6.6E-03**	**Hexane**

Unlimited Potential to Emit (tons/year) (After Integral Woodworking Controls)

Emissions Unit	PM*	PM10*	PM2.5*	SO_2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Woodworking Operations*	16.34	9.32	9.32	-	-	-	-	-	-	-	-
Sawdust Handling	5.77	2.08	2.08	-	-	-	-	-	-	-	-
Dip Coating	-	-	-	-	-	1.83	-	-	0.0	-	-
Natural Gas Combustion	0.01	0.03	0.03	0.002	0.37	0.02	0.31	440.7	6.9E-03	6.6E-03	Hexane
Unpaved Roads	14.08	3.59	3.59	-	-	-	-	-	-	-	-
Waxing	-	-	-	-	-	0.0	-	-	0.0	-	-
Total	**36.20**	**15.01**	**15.01**	**0.002**	**0.37**	**1.85**	**0.31**	**440.7**	**0.0**	**6.6E-03**	**Hexane**

*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 from the chipper were calculated after consideration of the cyclone controls for determining operating permit level and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the chipper were calculated before consideration of the cyclone controls.

Appendix A: Emissions Calculations
Woodworking
Sawing, Debarking, and Chipping Operations

Company Name: Pike Lumber Company – Milan
Source Address: 785 East Carr Street, Milan, Indiana 47031
Permit Number: M137-32725-00024
Reviewer: Dominic Williams

						Uncontrolled Emission Factor (lb/ton)		Uncontrolled Potential Emissions (lbs/hr)		Uncontrolled Potential Emissions (tons/yr)				Controlled Potential Emissions (lbs/hr)		Controlled Potential Emissions (tons/yr)	
Process (**Unit ID**)	Maximum Throughput (tons/hr)	Maximum Throughput (lbs/hr)	Density of Wood (lbs/ft3)	Maximum Throughput (ft3/hr)	Maximum Throughput (BDFT/hr)	PM	PM10/PM2.5*	PM	PM10/PM2.5*	PM	PM10/PM2.5*	Control Device	Control Efficiency	PM	PM10/PM2.5*	PM	PM10/PM2.5*
Debarking Operation (**DBK**)	9.64	19275	54.9	351.09	4213.11	0.02	0.011	0.19	0.11	0.84	0.46	None	0%	0.19	0.11	0.84	0.46
Sawing (main **SAW**, edger, trimmer)	9.64	19275	54.9	351.09	4213.11	0.35	0.200	3.37	1.93	14.77	8.44	None	0%	3.37	1.93	14.77	8.44
Chipper (**CHIP**)	3.15	6300	-	-	-	0.35	0.200	1.10	0.63	4.83	2.76	Sawdust Cyclone	85%	0.17	0.09	0.72	0.41
									Total	**20.4**	**11.67**				**Total**	**16.34**	**9.32**

*PM2.5 emissions assumed equal to PM10 emissions.

Methodology

Emission Factors are from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants
EPA March 1990 for Sawmill Operations (Log Sawing: General) (SCC 3-07-008-01, SCC 3-07-008-02, SCC 3-07-008-03)
1 board foot (BDFT) = 1/12 cubic foot
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)
Maximum Throughput (lbs/hr) = Maximum Throughput (cubic feet/hr) x Density of Wood (lbs/cubic foot)
Uncontrolled Potential Emissions (lbs/hr) = [Maximum Throughput (lbs/hr)] * [ton/2,000 lbs] * [Uncontrolled Emission Factor (lbs/ton)]
Uncontrolled Potential Emissions (tons/yr) = [Uncontrolled Potential Emissions (lbs/hr)] * [8,760 hrs/yr] * [ton/2,000 lbs]
Controlled Potential Emissions (lbs/hr) = [Uncontrolled Potential Emissions (lbs/hr)] * [1 - Control Efficiency]
Controlled Potential Emissions (tons/yr)] = [Controlled Potential Emissions (lbs/hr)] * [8760 hrs/yr] * [ton/2,000 lbs]

Appendix A: Emissions Calculations
Woodworking
Sawdust Handling Operations

Company Name: Pike Lumber Company – Milan
Source Address: 785 East Carr Street, Milan, Indiana 47031
Permit Number: M137-32725-00024
Reviewer: Dominic Williams

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

Emission Unit ID	Process Description	Maximum Throughput (tons/year)*	Maximum Throughput (tons/hour)	Emission Factor (lbs/ton)**	Pollutant	PTE (lbs/yr)	PTE (lbs/hr)	PTE (tons/yr)
DUST-C *(Sawdust conveyed)*	Sawdust is conveyed through a vibrating conveyor system from the sawmill operations to an enclosed auger system	5765.76	0.66	1.0	PM	5765.76	0.66	2.88
		5765.76	0.66	0.36	PM10	2075.67	0.24	1.04
		5765.76	0.66	0.36	PM2.5	2075.67	0.24	1.04
DUST-B *(Sawdust blown)*	Sawdust is blown from the enclosed auger system into a semi trailer	5765.76	0.66	1.0	PM	5765.76	0.66	2.88
		5765.76	0.66	0.36	PM10	2075.67	0.24	1.04
		5765.76	0.66	0.36	PM2.5	2075.67	0.24	1.04

* Maximum Throughput based upon 110.88 tons per week, 52 weeks per year.
** Sawdust handling emission factor is available only for PM10. Therefore, PM2.5 emissions were assumed equal to PM10.

Totals	
Pollutant	**PTE (tons/yr)**
PM	**5.77**
PM10	**2.08**
PM2.5	**2.08**

METHODOLOGY
Emission Factors are from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants EPA March 1990 for Sawmill Operations (sawdust pile handling) (SCC 3-07-008-03)
Potential to Emit (lbs/yr) = [Maximum Throughput (tons/year)] * [Emission Factor (lbs/ton)]
Potential to Emit (tons/yr) = [Potential to Emit (lbs/yr)] * [ton/2000 lbs]

Appendix A: Emissions Calculations
Dip Coating
VOC and HAP

Company Name: **Pike Lumber Company – Milan**
Source Address: **785 East Carr Street, Milan, Indiana 47031**
Permit Number: **M137-32725-00024**
Reviewer: **Dominic Williams**

Material	VOC content (g/L)	VOC Content (lbs/gal)	HAP Content (lbs/gal)	Maximum (gal/hour)	Maximum (gal/day)	Annual usage (gal/yr)	VOC Potential to Emit (lbs/day)	VOC Potential to Emit (tons/yr)	HAP Potential to Emit (tons/yr)
Sta Brite P*	258	2.15	0.00	0.19	4.53	1652	9.75	1.78	0.00
Nex Brite*	0	0.00	0.00	0.01	0.21	75	0.00	0.00	0.00
X-Lance*	147	1.23	0.00	0.01	0.21	75	0.25	0.05	0.00
			Totals	**0.21**	**4.94**		**10.00**	**1.83**	**0.00**

Notes:
*Each of these coatings is applied using a dip tank
Per manufacturer:
Sta Brite VOC content is 258 g/liter, no HAPs
Nex-Brite has no VOC or HAP
X-Lance VOC content is 147 g/liter, no HAPs

Methodology
VOC & HAP content (g/L) supplied by manufacturer (ISK Biotech)
Annual usage (gal/yr) supplied by source
VOC content (lb/gal) = VOC content (g/L) * 1 lb/454 g * 3.79 L/gal
Potential to Emit (PTE) tons/yr = Usage (gal/yr) * VOC content (lbs/gal) * 1 ton/2000 lbs
Potential to Emit (PTE) lbs/day = Potential to Emit (PTE) tons/yr * 2000 lbs/ton * 1 yr/365 days

Appendix A: Emission Calculations
Natural Gas Combustion Only
Capacity <100 MMBtu/hr
Boiler NG-B

Company Name: Pike Lumber Company – Milan
Source Address: 785 East Carr Street, Milan, Indiana 47031
Permit Number: M137-32725-00024
Reviewer: Dominic Williams

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
NG-B	0.85	1020	7.30
Totals	**0.85**		**7.30**

Criteria Pollutants

Pollutant	PM*	PM10*	PM2.5*	SO2	NOx**	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.01	0.03	0.03	0.002	0.37	0.02	0.31

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants	HAPs - Organics*				
Pollutant	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.67E-06	4.38E-06	2.74E-04	0.007	1.24E-05

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

Hazardous Air Pollutants	HAPs - Metals*						
Pollutant	As	Cd	Cr	Hg	Mn	Ni	Pb
Emission Factor in lb/MMcf	2.0E-04	1.1E-03	1.4E-03	2.6E-04	3.8E-04	2.1E-03	5.0E-04
Potential Emission in tons/yr	7.30E-07	4.02E-06	5.11E-06	9.49E-07	1.39E-06	7.67E-06	1.83E-06

*The seven highest metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Potential to Emit Total HAPs (tons/year) **0.007**

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

Greenhouse Gases (GHGs)

Greenhouse Gas	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	438.00	0.01	0.01
Summed Potential Emissions in tons/yr	438.02		
CO2e Total in tons/yr	440.67		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N20 GWP (310).

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide
As = Arsenic
Cd = Cadmium
Cr = Chromium
Hg = Mercury
Mn = Manganese
Ni = Nickel
Pb = Lead
CO2 = Cabon Dioxide
CH4 = Methane
N2O = Nitrous Oxide
CO2e = CO2 equivalent emissions

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: **Pike Lumber Company – Milan**
Source Address: **785 East Carr Street, Milan, Indiana 47031**
Permit Number: **M137-32725-00024**
Reviewer: **Dominic Williams**

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

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)
Log Truck (entering plant) (one-way trip)	40.0	1.0	40.0	45.0	1800.0	1000	0.189	7.6	2765.2
Log Truck (leaving plant) (one-way trip)	40.0	1.0	40.0	12.5	500.0	1000	0.189	7.6	2765.2
Lumber Truck (entering plant) (one-way trip)	7.0	1.0	7.0	16.0	112.0	500	0.095	0.7	242.0
Lumber Truck (leaving plant) (one-way trip)	7.0	1.0	7.0	40.0	280.0	500	0.095	0.7	242.0
		Total	**94.0**		**2692.0**			**16.5**	**6014.2**

Average Vehicle Weight Per Trip = 28.6 tons/trip
Average Miles Per Trip = 0.18 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	28.6	28.6	28.6	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	7.12	1.81	1.81	lb/mile
Mitigated Emission Factor, Eext =	4.68	1.19	1.19	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)
Log Truck (entering plant) (one-way trip)	9.85	2.51	2.51	6.47	1.65	1.65
Log Truck (leaving plant) (one-way trip)	9.85	2.51	2.51	6.47	1.65	1.65
Lumber Truck (entering plant) (one-way trip)	0.86	0.22	0.22	0.57	0.14	0.14
Lumber Truck (leaving plant) (one-way trip)	0.86	0.22	0.22	0.57	0.14	0.14
	21.41	**5.46**	**5.46**	**14.08**	**3.59**	**3.59**

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 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emissions Calculations
Lumber Waxing
VOC and HAP

Company Name: **Pike Lumber Company – Milan**
Source Address: **785 East Carr Street, Milan, Indiana 47031**
Permit Number: **M137-32725-00024**
Reviewer: **Dominic Williams**

Material	Density (lbs/gal)	VOC content (g/L)	VOC Content (lbs/gal)	HAP Content (lbs/gal)	Maximum (gal/day)	Annual usage (gal/yr)	VOC Potential to Emit (lbs/day)	VOC Potential to Emit (tons/yr)	HAP Potential to Emit (tons/yr)
Anchorseal	8.00	0	0.00	0.00	8.80	3212	0.00	0.00	0.00
				Total	**8.80**		**0.00**	**0.00**	**0.00**

Methodology
VOC and HAP content (lb/gal) obtained from MSDS
Annual usage (gal/yr) supplied by source
Potential to Emit (PTE) tons/yr = Usage (gal/yr) * VOC content (lbs/gal) * 1 ton/2000 lbs
Potential to Emit (PTE) lbs/day = Potential to Emit (PTE) tons/yr * 2000 lbs/ton * 1 yr/365 days

Appendix A: Emissions Calculations
326 IAC 6-3-2
Compliance Summary

Company Name: **Pike Lumber Company – Milan**
Source Address: **785 East Carr Street, Milan, Indiana 47031**
Permit Number: **M137-32725-00024**
Reviewer: **Dominic Williams**

Process (**Unit ID**)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)	Uncontrolled PM Emission factor* (lb/ton)	Uncontrolled PTE of PM (lbs/hr)	Control Device	Control Efficiency	Controlled PTE of PM (lbs/hr)	Is a Control Device Needed to Comply with 326 IAC 6-3-2?
Sawmill Operation (head **SAW**, edger, trimmer)	9.64	18.71	0.35	3.37	None	0%	3.37	NO
Sawdust handling (**DUST**)	0.66	3.10	1.00	0.66	None	0%	0.66	NO

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is up to sixty thousand (60,000) pounds per hour:

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

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

*Emission Factors are from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants
EPA March 1990 for Sawmill Operations (log sawing: general and sawdust pile handling) (SCC 3-07-008-01, SCC 3-07-008-02, SCC 3-07-008-03)

Methodology
This tab includes emission units that have Uncontrolled PTE of PM greater than 0.551 lbs/hr
Maximum Process Weights (tons/hr) are calculated from the Sawmill Operations tab Maximum Process Throughputs (tons/hr) and Sawdust Handling tab (tons/yr)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Larry Hunter
Pike Lumber Company - Milan
719 Front Street, PO Box 247
Akron, IN 46910

DATE: April 18, 2013

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

SUBJECT: Final Decision
New Source Construction and Minor Source Operating Permit
137-32725-00024

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:
John Brown, Responsible Official
Julie Delp, Wilcox Environmental Engineering
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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

April 18, 2013

TO: Osgood Public Library - Milan

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

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

Applicant Name: **Pike Lumber Company - Milan**
Permit Number: **137-32725-00024**

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	PWAY 4/18/2013 Pike Lumber Company - Milan 137-32725-00024 (final)		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	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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1		Larry Hunter Pike Lumber Company - Milan 719 Front Street, PO Box 247 Akron IN 46910 (Source CAATS)									
2		John Brown President Pike Lumber Company - Milan 719 Front Street, PO Box 247 Akron IN 46910 *(RO CAATS)*									
3		Ripley County Commissioners 115 North Main Street Rm 130 Versailles IN 47042 *(Local Official)*									
4		Ripley County Health Department 102 W 1st Street, Ste 106, P.O. Box 423 Versailles IN 47042-0423 *(Health Department)*									
5		Milan Town Council and Town Manager P.O. Box 86, 102 Lakeside Drive Milan IN 47031 *(Local Official)*									
6		Julie Delp Wilcox Environmental Engineering 5757 West 74th Street Indianapolis IN 46278 *(Consultant)*									
7		Chris E Volz, Jr PO Box 68 Milan IN 47031 *(Affected Party)*									
8		Osgood Public Library - Milan 1171 North Warpath Milan IN 47031 *(Library)*									
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