



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: June 6, 2013

RE: Blue River Wood Product / 175-33091-00016

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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Dale Eichmeyer
Blue River Wood Products
P O Box 104
Lebanon, Missouri 65536

June 6, 2013

Re: 175-33091-00016
Third Administrative Amendment to
M175-31580-00016

Dear Dale Eichmeyer:

Blue River Wood Products was issued a Minor Source Operating Permit (MSOP) Renewal No. M175-31580-00016 on June 8, 2012 for a stationary staves and headings manufacturing source located at 5170 W SR 56, Salem, Indiana 47167. On April 15, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to replace the one (1) chipper (EP2) with an "in kind" chipper equipped with an enclosed vibrating conveyor and to remove cyclone C1 from the permit. In addition, the source submitted an updated justification to consider the cyclone (C2) as an integral part of the chipper (EP2) and the sawing operations (EP4).

1. Pursuant to 326 IAC 2-6.1-6(d)(8), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit or units of the same type that is already permitted or replaces an existing unit and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, and the modification does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), or 326 IAC 2-7 (Part 70 Operating Permit).

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification for the cyclone (C2) to be considered as an integral part of the chipper (EP2) and the sawing operations (EP4):

The cyclone (C2) is used to collect sawdust from the chipper (EP3) and sawdust from the sawing operation (EP4). The sawdust created from the chipper and sawing operation is a product of changing the size and shape of a piece of wood. The cyclone (C2) collects the sawdust so it can be transferred by closed conveyance to a storage area. The collected wood then used as fuel in a wood waste-fire hot water heater (EP7). Without this cyclone to collect the sawdust for fuel, the sawdust portion used to fuel the hot water heater would fall to the ground and require off-site disposal. This would incur additional transportation and disposal cost for the source. Without sawdust for fuel for the hot water heater, another fuel, such as propane, would have to be purchased. Natural gas is not readily available at the source and would require the installation of a pipeline to the source. The cost of not operating the cyclone is detailed in the following table:

Cost of Sawdust Disposal

Annual Sawdust Production	3,904 tons
Disposal Cost per Tone	\$5.55
Annual Disposal Cost*	\$21,667.20

*Estimated annual sawdust production based on maximum hourly design rate.

Cost of Propane Fuel

Heat Input for Hot Water Heater (EP7)	2,000,000 Btu/hr
BTU Value for Propane	91,547 Btu/gal
Hourly Rate of Propane Consumed	21.85 gal/hr
Market Cost for Propane as of February 2007	\$1.07 per gal
Hourly Cost for Propane Consumption	\$23.38
Annual Fuel Cost **	\$204,773.50

** Annual fuel cost based upon market price of propane and 8,760 hour per year of operation.

Total Economic Impact of Not Operating the Cyclones

Annual Disposal Cost*	\$21,667.20
Annual Fuel Cost **	\$204,773.50
Total	\$226,440.70

Cost of Propane Fuel Based Upon Actual Amount of Wood Sawdust Used

The source used 87.2% of the 3,904 tons of sawdust produced or 3,404.3 tons, equivalent to 6,808,600 pounds of sawdust. If green oak was used as a fuel with a heat content of 2,650 Btu per pound, then the 3,404.3 tons would have generated (6,808,600 lbs x 2,650 Btu/lb) 18,042,790,000 Btu's. Using the heat content of propane of 91,547 Btu/gal 197,088 gallons of propane at a cost of \$1.07 per gal equals \$210,883 which is comparable to the cost estimated about based purely on the rating of the hot water heater.

Cost of Operating the Cyclone

(a) Electrical	
(1) Two (2) 50-horsepower electric motors	74.658 kw total
(2) Annual average operational hours	4,000 hours/year
(3) Price of electricity	\$0.06 per kwh
(4) Annual cost of Electricity	\$17,896.32/year
(b) Maintenance	
(1) Annual man-hours	90 hours/year
(2) Labor costs	\$21.50/hour
(3) Annual Cost of Maintenance	\$1,935.00/year
(c) Replacement Part of Cyclone	\$3,125.00/year
(d) Replacement Cost of Cyclone	
(1) Price	\$31,560.00 total
(2) Life span	10 years
(3) Annual Replacement Cost	\$3,156.00/year

Direct Operating Cost Per Year \$26,112.32

Revenue Generated from Sawdust/Chip Sales

Price per ton sold	\$10.50/ton of sawdust/chips
Average load	24.29 tons of sawdust/chips
Income per load	\$255.05/load
Loads per year	70/year
Annual income	\$17,853.15/year
Hauling cost per load	\$300/load
Annual hauling cost	\$21,000/year
Net loss from sale/hauling per year	\$3,146.85

Total Cost of Operating the Cyclone

Direct Operating Cost Per Year	\$26,112.32
Net loss from sale/hauling per year	\$ 3,146.85
Total	\$29,259.17

Based on the cost analysis detailed above submitted by the applicant, Blue River Wood Product saves more than \$197,181.53 (\$226,440.70 - \$29,259.17) per year by using sawdust as a fuel instead of burning propane in the hot water heater. This annual cost saving takes into account the energy cost associated with operating the cyclone (C2) and the estimated annualized cost to completely replace the cyclone dust collection system every 10 years. Since such equipment has a lifetime of ten (10) years or more, this estimate is conservative.

IDEM, OAQ has evaluated the justification and agrees that the cyclone (C2) will be considered as an integral part of the chipper (EP3) and sawing operation (EP4). The primary purpose of the cyclone is sawdust collection, not pollution control, with the sawdust being transferred via closed conveyance to storage for later use as fuel for the hot water heater, and the cyclone has an overwhelming net positive economic effect. Therefore, the calculations will be determined using the potential to emit after control by the cyclone. Operating conditions in the permit will specify that the cyclone shall operate at all times when the chipper and sawing operations are in operation.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby amended as follows with the deleted language as strikeouts and new language **bolded**.

A.2 Emission Units and Pollution Control Equipment Summary

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

...

- (b) One (1) **enclosed** chipper, identified as EP 2, **approved for construction in 2012, equipped with an enclosed vibrating conveyor**, controlled by an **existing** cyclone, identified as C42, ~~constructed in 2000, exhausted~~ to Stack S24, capacity: 6,000 pounds of wood per hour.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) **enclosed** chipper, identified as EP 2, **approved for construction in 2012, equipped with an enclosed vibrating conveyor**, controlled by an **existing** cyclone, identified as C42, ~~constructed in 2000, exhausted~~ to Stack S24, capacity: 6,000 pounds of wood per hour.

...

...

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the chipper (EP 2), the sawing operation (EP 4), ~~eyclone C4~~, cyclone C2, and the sawdust wood waste-fired hot water heater (EP 7). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Particulate Control

-
- (a) In order to comply with Condition D.1.1, the cyclones, identified as ~~C1~~ and C2, for particulate control shall be in operation and control emissions from the woodworking facility at all times the woodworking facility is in operation.
- ...

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.6 Visible Emissions Notations

-
- (a) Daily visible emission notations of the chipper/cyclone ~~C1 stack exhaust (S1)~~ and sawing operation/cyclone C2 stack exhaust (S2) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- ...

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

-
- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain a daily record of visible emission notations of the chipper/cyclone ~~C1 stack exhaust (S1)~~ and sawing operation/cyclone C2 stack exhaust (S2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- ...

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Marcia Earl of my staff at 317-233-0863 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,



Nathan Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Emission Calculations

NB/me

cc: File - Washington County
Washington County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Blue River Wood Products
5170 W State Road 56
Salem, Indiana 47167

(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. M175-31580-00016	
Issued by: <i>Original Document Signed by</i> Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 8, 2012 Expiration Date: June 8, 2022

First Administrative Amendment No. 175-32530-00016, issued December 3, 2012
Second Administrative Amendment No. 175-32965-00016, issued April 2, 2013

Third Administrative Amendment No. 175-33091-00016	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 6, 2013 Expiration Date: June 8, 2022

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[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONSError! Bookmark not defined.

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

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 Particulate [326 IAC 6-2-4]
- D.1.3 Wood Waste Boiler Fuel Limitation [326 IAC 2-6.1-5] [40 CFR Part 60, Subpart AAAA] [40 CFR Part 60, Subpart EEEE] [326 IAC 12]
- D.1.4 Preventive Maintenance [326 IAC 1-6-3]

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National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements [326 IAC 2-8-4(1)]

- E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants [40 CFR Part 63, Subpart A]
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Attachment A: National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources [40 CFR Part 63, Subpart JJJJJJ]

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 staves and headings manufacturing facility.

Source Address:	5170 W State Road 56, Salem, Indiana 47167
General Source Phone Number:	812-883-9374
SIC Code:	2429 (Special Product Sawmills)
County Location:	Washington
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) de-barker, identified as EP 1, constructed in 2000, capacity: 24,138 pounds of wood logs per hour.
- (b) One (1) enclosed chipper, identified as EP 2, approved for construction in 2012, equipped with an enclosed vibrating conveyor, controlled by an existing cyclone, identified as C2, exhausting to Stack S2, capacity: 6,000 pounds of wood per.
- (c) One (1) chipper load-out operation, identified as EP 3, constructed in 2000, capacity: 6,000 pounds of wood per hour.
- (d) One (1) sawing operation, identified as EP 4, controlled by a cyclone, identified as C2, exhausted to Stack S2, consisting of:
 - (1) Two (2) chainsaws, constructed in 2000 and 2008, total capacity: 24,138 pounds of wood logs per hour,
 - (2) One (1) circle-saw splitter, constructed in 2000, capacity: 22,280 pounds of wood logs per hour,
 - (3) One (1) band-saw splitter, constructed in 2000, capacity: 22,280 pounds of wood logs per hour,
 - (4) Two (2) band re-saws, both constructed in 2000, total capacity: 21,166 pounds of wood logs per hour,
 - (5) Two (2) first edgers, both constructed in 2000, total capacity: 21,166 pounds of wood per hour,
 - (6) Two (2) second edgers, both constructed in 2000, total capacity: 21,166 pounds of wood per hour,

- (7) Three (3) rip-saw edgers, constructed in 2000, 2008, and approved for construction in 2010, total capacity: 7091 pounds of wood per hour,
- (8) One (1) chop saw, constructed in 2000, capacity: 2488 pounds of wood per hour, and
- (9) Two (2) chop saws, both constructed in 2008, total capacity: 4975 pounds of wood per hour.
- (e) One (1) sawdust stockpile, identified as EP 5, throughput capacity: 1760 pounds of sawdust per hour, storage capacity: 2,136 tons of sawdust.
- (f) One (1) sawdust load-out operation, identified as EP 6, capacity: 1760 pounds of sawdust per hour.
- (g) One (1) sawdust wood waste-fired hot water heater, identified as EP 7, rated at 3.94 million British thermal units per hour, constructed in 2006, exhausted to Stack 3, capacity: 703 pounds of sawdust wood waste per hour.

EP 7 is an affected unit under the provisions of 40 CFR 63, Subpart JJJJJJ.

Note: This boiler shall only combust clean wood. Clean wood is defined as follows: Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

- (h) Four (4) drying kilns, identified as EP 8, constructed in 2006, 2006, 2012, and 2013, respectively, heated with steam from the sawdust wood waste-fired hot water heater, and a total capacity: 355 pounds of wood chips per hour, each.
- (i) Six (6) mobile K-1 kerosene-fired space heaters, rated at 0.215 million British thermal units per hour, each.
- (j) One (1) maintenance welding operation, using less than 625 pounds of rod or wire per day.
- (k) One (1) storage tank, constructed in 2000, capacity: 500 gallons of diesel fuel.
- (l) One (1) storage tank, constructed in 2000, capacity: 500 gallons of kerosene.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M175-31580-00016, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

- (c) 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.
- (d) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M175-31580-00016 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.11 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.12 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.13 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.14 Source Modification Requirement

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

B.15 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.16 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.17 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.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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. Support information includes the following:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the.Records of required monitoring information include the following:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.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) 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:

- (b) One (1) enclosed chipper, identified as EP 2, approved for construction in 2012, equipped with an enclosed vibrating conveyor, controlled by an existing cyclone, identified as C2, exhausting to Stack S2, capacity: 6,000 pounds of wood per.
- (c) One (1) chipper load-out operation, identified as EP 3, constructed in 2000, capacity: 6,000 pounds of wood per hour.
- (d) One (1) sawing operation, identified as EP 4, controlled by a cyclone, identified as C2, exhausted to Stack S2, consisting of:
 - (1) Two (2) chainsaws, constructed in 2000 and 2008, total capacity: 24,138 pounds of wood logs per hour,
 - (2) One (1) circle-saw splitter, constructed in 2000, capacity: 22,280 pounds of wood logs per hour,
 - (3) One (1) band-saw splitter, constructed in 2000, capacity: 22,280 pounds of wood logs per hour,
 - (4) Two (2) band re-saws, both constructed in 2000, total capacity: 21,166 pounds of wood logs per hour,
 - (5) Two (2) first edgers, both constructed in 2000, total capacity: 21,166 pounds of wood per hour,
 - (6) Two (2) second edgers, both constructed in 2000, total capacity: 21,166 pounds of wood per hour,
 - (7) Three (3) rip-saw edgers, constructed in 2000, 2008, and approved for construction in 2010, total capacity: 7091 pounds of wood per hour,
 - (8) One (1) chop saw, constructed in 2000, capacity: 2488 pounds of wood per hour, and
 - (9) Two (2) chop saws, both constructed in 2008, total capacity: 4975 pounds of wood per hour.
- (e) One (1) sawdust stockpile, identified as EP 5, throughput capacity: 1760 pounds of sawdust per hour, storage capacity: 2,136 tons of sawdust.
- (f) One (1) sawdust load-out operation, identified as EP 6, capacity: 1760 pounds of sawdust per hour.

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

Emissions Unit Description (continued):

- (g) One (1) sawdust wood waste-fired hot water heater, identified as EP 7, rated at 3.94 million British thermal units per hour, constructed in 2006, exhausted to Stack 3, capacity: 703 pounds of sawdust wood waste per hour.

EP 7 is an affected unit under the provisions of 40 CFR 63, Subpart JJJJJJ.

Note: This boiler shall only combust clean wood. Clean wood is defined as follows:
Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

(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 allowable particulate emission rate from the chipper, identified as EP 2, and chipper load-out operation, identified as EP 3, shall not exceed 8.56 pounds per hour each when operating at a process weight rate of 6,000 pounds per hour each.

The pounds per hour limitations were calculated with 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:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the sawing operation, identified as EP 4, shall not exceed 48.22 pounds per hour when operating at a process weight rate of 146,750 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) sawdust stockpile, identified as EP 5, shall not exceed 3.76 pounds per hour when operating at a process weight rate of 1760 pounds of sawdust per hour.

The pounds per hour limitation was calculated with 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:

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

- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) sawdust load-out operation, identified as EP 6, shall not exceed 3.76 pounds per hour when operating at a process weight rate of 1760 pounds of sawdust per hour.

The pounds per hour limitation was calculated with 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:

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

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

Pursuant to 326 IAC 6-2-4(a), particulate emissions for the sawdust wood waste-fired hot water heater, identified as EP 7, shall not exceed 0.60 pounds per million British thermal units heat input.

D.1.3 Wood Waste Boiler Fuel Limitation [326 IAC 2-6.1-5] [40 CFR Part 60, Subpart AAAA] [40 CFR Part 60, Subpart EEEE] [326 IAC 12]

- (a) In order to comply with 326 IAC 2-6.1-5, the Permittee shall only combust clean wood in the sawdust wood waste-fired hot water heater (EP 7). Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).
- (b) In order to render the provisions of 40 CFR Part 60, Subpart AAAA, not applicable, the Permittee shall not combust municipal solid waste, as defined in 40 CFR 60.1465, in the sawdust wood waste-fired hot water heater (EP 7). Municipal solid waste includes: household, commercial/retail, or institutional waste. Household waste includes material discarded by residential dwellings, hotels, motels, and other similar permanent or temporary housing. Commercial/retail waste includes material discarded by stores, offices, restaurants, warehouses, nonmanufacturing activities at industrial facilities, and other similar establishments or facilities. Institutional waste includes materials discarded by schools, by hospitals (nonmedical), by nonmanufacturing activities at prisons and government facilities, and other similar establishments or facilities.
- (c) In order to render the provisions of 40 CFR Part 60, Subpart EEEE, not applicable, the Permittee shall not combust municipal solid waste, as defined in 60 CFR 60.2977, in the sawdust wood waste-fired hot water heater (EP 7). Municipal solid waste includes refuse (and refuse-derived fuel) collected from the general public and from residential, commercial, institutional, and industrial sources consisting of paper, wood, yard wastes, food wastes, plastics, leather, rubber, and other combustible materials and non-combustible materials such as metal, glass and rock. Municipal solid waste does not include industrial process wastes or medical wastes that are segregated from such other wastes.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the chipper (EP 2), the sawing operation (EP 4), cyclone C2, and the sawdust wood waste-fired hot water heater (EP 7). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Particulate Control

- (a) In order to comply with Condition D.1.1, the cyclone, identified as C2, for particulate control shall be in operation and control emissions from the woodworking facility at all times the woodworking facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the chipper and sawing operation/cyclone C2 stack exhaust (S2) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain a daily record of visible emission notations of the chipper and sawing operation/cyclone C2 stack exhaust (S2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

- (b) Section C - General Record Keeping Requirements, of this permit, contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (g) One (1) sawdust wood waste-fired hot water heater, identified as EP 7, rated at 3.94 million British thermal units per hour, constructed in 2006, exhausted to Stack 3, capacity: 703 pounds of sawdust wood waste per hour.

EP 7 is an affected unit under the provisions of 40 CFR 63, Subpart JJJJJJ.

Note: This boiler shall only combust clean wood. Clean wood is defined as follows:
Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

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

National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63, the Permittee shall comply with the provisions of 40 CFR Part 63 Subpart A – General Provisions, except as otherwise specified in 40 CFR Part 63, Subpart JJJJJJ.

- (b) Pursuant to 40 CFR 63, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources [40 CFR Part 63, Subpart JJJJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJJJ (included as Attachment A of this permit), except as otherwise specified in 40 CFR 63, Subpart JJJJJJ:

The sawdust wood waste fired hot water heater is subject to the following portions of 40 CFR 63, Subpart JJJJJJ:

- (1) 40 CFR 63.11193
- (2) 40 CFR 63.11194(a)(1), (b), and (e)
- (3) 40 CFR 63.11196(a)(1) and (d)
- (4) 40 CFR 63.11200
- (5) 40 CFR 63.11201(b) and (d)
- (6) 40 CFR 63.11205(a)
- (7) 40 CFR 63.11210(c)

- (8) 40 CFR 63.11214(b)
- (9) 40 CFR 63.11223(a) and (b)
- (10) 40 CFR 63.11225(a), (b), (c), (d) and (g)
- (11) 40 CFR 63.11235
- (12) 40 CFR 63.11236
- (13) 40 CFR 63.11237
- (14) Table 2 (item 3)
- (15) Table 8

**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:	Blue River Wood Products
Address:	5170 W State Road 56
City:	Salem, Indiana 47167
Phone #:	812-883-9374
MSOP #:	M175-31580-00016

I hereby certify that Blue River Wood Products is :

still in operation.

no longer in operation.

I hereby certify that Blue River Wood Products is :

in compliance with the requirements of MSOP M175-31580-00016.

not in compliance with the requirements of MSOP M175-31580-00016.

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:

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

Potential to Emit (tons/yr) after Administrative Amendment (Before Integral Controls)

Emission Unit Description (Identification)	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP (Formaldehyde)	
De-barker (EP 1)	1.06	0.58	0.58	-	-	-	-	-	-	-	-
Chipper (EP 2)*	26.28	10.51	10.51	-	-	-	-	-	-	-	-
Chipper Load-Out (EP 3)	26.28	15.77	15.77	-	-	-	-	-	-	-	-
Sawing Operation (EP 4)*	112.48	64.28	64.28	-	-	-	-	-	-	-	-
Sawdust Pile Handling & Wood Waste Storage (EP 5)	7.71	3.62	3.62	-	-	-	-	-	-	-	-
Sawdust Load-Out (EP 6)	7.71	3.62	3.62	-	-	-	-	-	-	-	-
Sawdust Wood Waste-Fired Hot Water Heater (EP 7)	5.69	5.30	4.61	0.43	3.80	0.29	10.35	-	0.61	0.08	Formaldehyde
Wood Drying Kilns (EP 8)	2.24	0.28	0.28	-	-	1.59	-	-	0.007	0.007	Formaldehyde
6 Kerosene Space Heaters	0.08	0.09	0.06	2.87	0.81	0.01	0.20	871.15	2.8E-04	8.5E-05	Selenium
Unpaved Roads	3.83	0.97	0.10	-	-	-	-	-	-	-	-
Welding	5.16	5.16	5.16	-	-	-	-	-	0.22	0.22	Manganese
2 Storage Tanks	-	-	-	-	-	negl.	-	-	negl.	negl.	negl.
Total	198.52	110.19	108.59	3.30	4.60	1.89	10.56	871.15	0.84	0.08	Formaldehyde

negl. = negligible; "*" = not applicable

Potential to Emit (tons/yr) after Administrative Amendment (After Integral Controls)

Emission Unit Description (Identification)	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP (Formaldehyde)	
De-barker (EP 1)	1.06	0.58	0.58	-	-	-	-	-	-	-	-
Chipper (EP 2)*	3.94	1.58	1.58	-	-	-	-	-	-	-	-
Chipper Load-Out (EP 3)	26.28	15.77	15.77	-	-	-	-	-	-	-	-
Sawing Operation (EP 4)*	16.87	9.64	9.64	-	-	-	-	-	-	-	-
Sawdust Pile Handling & Wood Waste Storage (EP 5)	7.71	3.62	3.62	-	-	-	-	-	-	-	-
Sawdust Load-Out (EP 6)	7.71	4.63	4.63	-	-	-	-	-	-	-	-
Sawdust Wood Waste-Fired Hot Water Heater (EP 7)	5.69	5.30	4.61	0.43	3.80	0.29	10.35	-	0.61	0.08	Formaldehyde
Wood Drying Kilns (EP 8)	2.24	0.28	0.28	-	-	1.59	-	-	0.007	0.007	Formaldehyde
6 Kerosene Space Heaters	0.08	0.09	0.06	2.87	0.81	0.01	0.20	871.15	2.8E-04	8.5E-05	Selenium
Unpaved Roads	3.83	0.97	0.10	-	-	-	-	-	-	-	-
Welding	5.16	5.16	5.16	-	-	-	-	-	0.22	0.22	Manganese
2 Storage Tanks	-	-	-	-	-	negl.	-	-	negl.	negl.	negl.
Total	80.57	47.62	46.03	3.30	4.60	1.89	10.56	871.15	0.84	0.08	Formaldehyde

negl. = negligible; "*" = not applicable

*IDEM has determined that the cyclone (C2) is considered as an integral part of the chipper (EP3) and sawing operation (EP4). Therefore, the calculations were determined using the potential to emit after control by the cyclone. Operating conditions in the permit will specify that the cyclone shall operate at all times when the chipper and sawing operations are in operation..

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garretson 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 sawing operation (EP 4) were calculated after consideration of the cyclone (C2) controls for determining operating permit level and 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 operation (EP2) and the sawing operation (EP 4) were calculated before consideration of the cyclone (C2) controls.

Appendix A: Emissions Calculations
Woodworking and Kilns
Woodworking: EP 1 through EP 6, EP 8

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

Emission Unit	Capacity (lbs/hr)	Uncontrolled Emission Factor (lbs/ton)			Uncontrolled PTE (tons/yr)			Controlled PTE (tons/yr)		
		PM	PM10/PM2.5*	PM	PM10/PM2.5*	Control Efficiency (%)	PM	PM10/PM2.5*	PM	PM10/PM2.5*
De-barker (EP 1) SCC 30700801	24,138	0.02	0.01	1.06	0.58	0%	1.06	0.58	1.06	0.58
Chipper (EP 2) SCC 30700808	6000	2.00	0.80	26.28	10.51	85%	3.94	1.58	3.94	1.58
Chipper Load-Out (EP 3) SCC 30703002	6000	2.00	1.20	26.28	15.77	0%	26.28	15.77	26.28	15.77
Chainsaws (EP 4) SCC 30700802	24,138	0.35	0.20	18.50	10.57	85%	2.78	1.59	2.78	1.59
Circle-Saw Splitter (EP 4) SCC 30700802	22,280	0.35	0.20	17.08	9.76	85%	2.56	1.46	2.56	1.46
Band Saw Splitter (EP 4) SCC 30700802	22,280	0.35	0.20	17.08	9.76	85%	2.56	1.46	2.56	1.46
Band Re-Saws (EP 4) SCC 30700802	21,166	0.35	0.20	16.22	9.27	85%	2.43	1.39	2.43	1.39
First Edgers (EP 4) SCC 30700802	21,166	0.35	0.20	16.22	9.27	85%	2.43	1.39	2.43	1.39
Second Edgers (EP 4) SCC 30700802	21,166	0.35	0.20	16.22	9.27	85%	2.43	1.39	2.43	1.39
Rip-Saw Edgers (EP 4) SCC 30700802	7091	0.35	0.20	5.44	3.11	85%	0.82	0.47	0.82	0.47
Chop Saws (EP 4) SCC 30700802	7463	0.35	0.20	5.72	3.27	85%	0.86	0.49	0.86	0.49
Subtotal EP 4	146,750			112.48	64.28		16.87	9.64	16.87	9.64
Sawdust Pile Handling (EP 5) SCC 30700803	1760	1.00	0.36	3.85	1.39	0%	3.85	1.39	3.85	1.39
Wood Waste Storage (EP 5) SCC 30703001	1760	1.00	0.58	3.85	2.24	0%	3.85	2.24	3.85	2.24
Subtotal EP 5	3,520.0			7.71	3.62		7.71	3.62	7.71	3.62
Sawdust Load-Out (EP 6) SCC 30703002	1760	2.00	1.20	7.71	4.63	0%	7.71	4.63	7.71	4.63

Methodology

*PM2.5 emissions assumed equal to PM10 emissions.
 Emission Factors are from "Sawmill Operations & Misc. Woodworking Operations in Air," March 1990.
 Uncontrolled PTE (tons/yr) = Capacity (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 1 tons/2000 lbs x 8760 hrs/yr
 Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) x (1 - Control Efficiency)

Emission Unit	Total Capacity (lbs/hr)	Uncontrolled Emission Factor (lbs/ton)*			Uncontrolled PTE (tons/yr)				
		PM	PM10/PM2.5	VOC	Formaldehyde	PM	PM10/PM2.5	VOC	Formaldehyde
2 Wood Drying Kilns (EP 8)	710	0.72	0.090	0.51	0.0024	1.12	0.14	0.79	0.004
1 Wood Drying Kilns (EP 8)	355	0.72	0.090	0.51	0.0024	0.56	0.07	0.40	0.002
1 Wood Drying Kilns (EP 8) New	355	0.72	0.090	0.51	0.0024	0.56	0.07	0.40	0.002
Total						2.24	0.28	1.59	0.007

Methodology

*Emission factors are from AP 42 Chapter 10.6.1 (Waterboard/Oriented Strandboard Manufacturing) and are in units of lb per ton of oven-dried wood material out of dryer.
 PM and PM10 emission factors are from AP 42 Table 10.6.1.1 (Conveyor dryer, indirect-heated, heated zones, hardwood - SCC 30701040). PM2.5 emissions assumed equal to PM10 emissions.
 VOC and Formaldehyde emission factors are from AP 42 Table 10.6.1-3 (Conveyor dryer, indirect-heated, heated zones, hardwood - SCC 30701040).

Uncontrolled PTE (tons/yr) = Total Capacity (lbs/hr) x 1 ton/2000 lbs x Uncontrolled Emission Factor (lbs/ton) x 1 tons/2000 lbs x 8760 hrs/yr

**Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Bark/Bark and Wet Wood
Sawdust Wood Waste-Fired Hot Water Heater (EP 7)**

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

Capacity (MMBtu/hr) = 3.94

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	0.33	0.307	0.267	0.025	0.22	0.017	0.60
Potential Emissions (tons/yr)	5.69	5.30	4.61	0.43	3.80	0.29	10.35

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.
 *PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).
 PM10 emission factor includes filterable PM10 (no control) and condensible PM (no control).
 PM2.5 emission factor include filterable PM2.5 (no control) and condensible PM (no control).
 All emission factors are from AP-42 for bark/bark and wet wood from Tables 1.6-1 and 1.6-2.

Hazardous Air Pollutants (HAPs)

	HAPs - Organics		
	Acrolein	Benzene	Hydrogen Chloride
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	1.9E-02
Potential Emission in tons/yr	0.07	0.07	0.33

	HAPs - Metals				Total HAPs
	Lead	Mercury	Arsenic	Nickel	
Emission Factor in lb/MMBtu	4.8E-05	3.5E-06	2.2E-05	1.6E-03	3.5E-02
Potential Emission in tons/yr	8.28E-04	6.04E-05	3.80E-04	2.76E-02	0.61

Methodology

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), 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.
 Potential Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs
 HAP emission factors include the five (5) HAPs with the highest AP-42 emission factors.

Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
All Wood Waste Fuel Types
Sawdust Wood Waste-Fired Hot Water Heater (EP 7)

Company Name: Blue River Woods Products
Source Location: 5170 West State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

Capacity (MMBtu/hr) = 3.94

	Greenhouse Gases		
	CO2 **	CH4 0.032	N2O
Emission Factor in kg/mmBtu from 40 CFR 98			
Emission Factor in lb/mmBtu from AP-42			0.013
Potential Emission in tons/yr	**	1.2	0.22
Summed Potential Emissions in tons/yr		1.4	**
CO2e Total in tons/yr		95.1	**

Methodology

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
 CO2 and CH4 Emission Factors from Tables C-1 and 2 of 40 CFR Part 98 Subpart C. N2O emission factor from AP-43 Chapter 1.6 (revised 3/02).
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (kg/mmBtu) x 2.20462 lb/kg x 8760 hrs/yr /2,000 lb/ton
 Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (lb/mmBtu) x 8760 hrs/yr /2,000 lb/ton
 CO2e (tons/yr) = CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).**
 ** On July 1, 2011 EPA stayed the counting of CO2 emissions from Bioenergy and other Biogenic Sources.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

Six (6) K-1 Kerosene-fired Space Heaters rated at 0.215 mmBtu/hr, each

Heat Input Capacity
 MMBtu/hr 1.29

Potential Throughput
 kgals/year 80.72

S = Weight % Sulfur 0.5

	Pollutant						
	PM*	PM10	direct PM2.5	SO2 (142.0S)	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	2.3	1.55	71	20.0	0.34	5.0
Potential Emission in tons/yr	0.08	0.09	0.06	2.87	0.81	0.014	0.20

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.140 MM Btu
 Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, 1.3-3, and 1.3-6 (SCC 1-03-005-01/02/03) (dated 5/10)
 *PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
 PM10 emission factor is filterable PM10 (1.00 lb/kgal) + condensable PM (1.3 lb/kgal)
 PM2.5 emission factor is filterable PM2.5 (0.25 lb/kgal) + condensable PM (1.3 lb/kgal)
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

		HAPs - Metals			
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	2.3E-05	1.7E-05	1.7E-05	1.7E-05	5.1E-05

		HAPs - Metals (continued)		
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.7E-05	3.4E-05	1.7E-05	8.5E-05

Potential to Emit Total HAPs (tons/yr) 2.8E-04

Methodology

No data was available in AP-42 for organic HAPs.
 Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton
 See Page 3 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Greenhouse Gas Emissions**

Company Name: Blue River Woods Products
Address, City IN Zip: 5170 West State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/kgal	21,500	0.216	0.26
Potential Emission in tons/yr	868	0.0	0.0
Summed Potential Emissions in tons/yr	868		
CO2e Total in tons/yr	871		

Methodology

The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300. Emission Factors are from AP 42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file) Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/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 N2O GWP (310).

**Appendix A: Emissions Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

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)
Vehicle (entering plant) (one-way trip)	15.0	2.4	36.0	40.0	1440.0	370	0.070	2.5	919.8
Vehicle (leaving plant) (one-way trip)	15.0	2.4	36.0	40.0	1440.0	370	0.070	2.5	919.8
Totals			72.0		2880.0			5.0	1839.6

Average Vehicle Weight Per Trip = 40.0 tons/trip
Average Miles Per Trip = 0.07 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	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 =	22.0	22.0	22.0	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 =	6.32	1.61	0.16	lb/mile
Mitigated Emission Factor, Eext =	4.16	1.06	0.11	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)	2.91	0.74	0.07	1.91	0.49	0.05
Vehicle (leaving plant) (one-way trip)	2.91	0.74	0.07	1.91	0.49	0.05
Totals	5.82	1.48	0.15	3.83	0.97	0.10

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
Welding and Thermal Cutting**

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Metal Inert Gas (MIG)(carbon steel)	2	10	0.0055	0.0005						0.110	0.010	0.010
Stick (E7018 electrode)	3	15	0.0211	0.0009						0.950	0.041	0.041
FLAME CUTTING												
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
Oxyacetylene	2	1	6	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1	0.375	24	0.1622	0.0005	0.0001	0.0003	0.117	3.6E-04	7.2E-05	2.2E-04	0.001
				0.0039				0.002				0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								1.18	0.05	0.00	0.00	0.05
Potential Emissions lbs/day								28.28	1.22	0.00	0.01	1.23
Potential Emissions tons/year								5.16	0.22	0.00	0.00	0.22

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
 **Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.
 Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations
Demonstration of Compliance with 326 IAC 6-3-2**

Company Name: Blue River Woods Products
Source Address: 5170 W State Road 56, Salem, IN 47167
Administrative Amendment: 175-33091-00016
Reviewer: Marcia Earl

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (lbs/hr)	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
De-Barker (EP 1)*	24,138	12.07	0.02	NA	0%	0.24	NA	NA
Chipper (EP 2)*	6,000	3.0	2	Cyclone C2	85%	6.00	8.56	0.90
Chipper Load-out (EP 3)*	6,000	3.0	2	NA	0%	6.00	8.56	6.00
Sawing Operation (EP 4) **	146,750	73.4	0.35	Cyclone C2	85%	25.68	48.22	3.85
Sawdust Stockpile (EP 5) *	1,760	0.9	1	NA	0%	0.88	3.76	0.88
Sawdust Load-out (EP 6) *	1,760	1	2	NA	0%	1.76	3.76	1.76
Sawdust Wood Waste-fired hot water heater (EP 7)*	703	0.4	0.56	NA	0%	0.20	NA	NA

NA = not applicable since the uncontrolled emissions is less than 0.551 lbs/hr

Allowable emissions under 326 IAC 6-3-2 were calculated using the following equations:

*Interpolation of the data in this table for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation

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

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

**Interpolation and extrapolation of the data for process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where}$$

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

When the process weight rate exceeds two hundred (200) tons per hour, the maximum allowable emission may exceed the emission rate derived by the equation above, provided the concentration of particulate matter in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

Calculations show that the emission units are in compliance with the requirements of 326 IAC 6-3-2 before the use of control devices.

Methodology

Maximum Throughput (tons/hr) = Maximum Throughput (lbs/hr) x 1 ton/2000 lbs
PTE of PM/PM10 Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)
PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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

TO: Dale Eichmeyer
Blue River Wood Products
5170 W SR 56
Salem, IN 47167

DATE: June 6, 2013

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

SUBJECT: Final Decision
MSOP
175-33091-00016

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:
Mike Campbell, Responsible Official
Pamela Block, Additional Recipient
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff Blue River Wood Products 175-33091-00016 (Final)	DPABST 6/6/2013	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

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Dale Eichmeyer Blue River Wood Products PO Box 104 Lebanon MO 65536 (Source CAATS) (CONFIRM DELIVERY)										
2		Mike Campbell Mgr Blue River Wood Products 5170 W SR 56 Salem IN 47167 (RO CAATS)										
3		Washington County Health Department 806 Martinsburg Road, Ste 100 Salem IN 47167 (Health Department)										
4		Washington County Commissioners 99 Public Square Salem IN 47167 (Local Official)										
5		Salem City Council and Mayors Office 38 Public Square Salem IN 47167 (Local Official)										
6		Salem Washington Twp _Public Library 212 N Main St Salem IN 47167-2099 (Library)										
7		Ms. Pamela Block 425 Main Street Evansville IN 47708 (Affected Party)										
8												
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