



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

TO: Interested Parties / Applicant

DATE: September 16, 2013

RE: CLM Pallet Recycling, Inc. / 059-33390i-00037

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

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 6/13/13



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Commissioner

Mark Loughery  
CLM Pallet Recycling, Inc.  
3103 W 1000 N  
Fortville, IN 46040

September 16, 2013

Re: Interim Significant Permit Revision Petition Approval  
059-33390I-00037

Dear Mr. Loughery:

On August 28, 2013, the Office of Air Quality (OAQ) received an interim Significant Permit Revision petition from CLM Pallet Recycling, Inc., located at 3103 W 1000 N, in Fortville, Indiana for construction of four (4) new wood gasification units (carbonizers), equipped with oxidizers and heat recovery for generating electricity, at the existing a stationary wood pallet recycling plant.

A public notice of the interim Significant Permit Revision petition was published in the Daily Reporter on August 27, 2013. The public comment period ended on September 10, 2013.

Since there are no comments received during the public comment period, pursuant to 326 IAC 2-13-1(i), the interim Significant Permit Revision petition is in effect upon issuance and will expire on the effective date of the final Significant Permit Revision permit.

Pursuant to 326 IAC 2-13-1(i), the interim Significant Permit Revision petition is in effect upon issuance and will expire on the effective date of the final Significant Permit Revision permit.

The interim Significant Permit Revision petition may be revoked after its effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final Significant Permit Revision permit is denied. The IDEM has reviewed this interim Significant Permit Revision petition and has not found any such reason. The facilities specified in the interim Significant Permit Revision petition may not operate until the final Significant Permit Revision permit is issued by OAQ.

The interim Significant Permit Revision petition is federally enforceable. Detailed construction and operation conditions will be specified in the final Significant Permit Revision No. 059-33390I-00037.

If you have any questions regarding this interim Significant Permit Revision petition, please contact Brian Wright, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Brian Wright or extension 4-6544, or dial 317-234-6544.

Sincerely,

Nathan C. Bell, Section Chief  
Permits Branch  
Office of Air Quality

Enclosure: Interim Permit Evaluation (3 pages)

BW

cc: File – Hancock County  
Hancock County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Cornerstone Environmental Health and Safety, Inc.



## Indiana Department of Environmental Management Office of Air Management

### Interim Significant Permit Revision / Significant Source Modification Evaluation Sheet

<b>Company Name:</b> CLM Pallet Recycling, Inc.	
<b>Location:</b> 3103 W 1000 N, Fortville, IN 46040	<b>Permit No:</b> 059-33390I-00037
<b>Permit Reviewer:</b> Brian Wright	<b>Date Receipt of Application:</b> 8/28/2013
	<b>Date of review:</b> 9/16/2013
<b>Description of the interim construction:</b> Construction of four (4) new wood gasification units (carbonizers), equipped with oxidizers and heat recovery for generating electricity, at the existing a stationary wood pallet recycling plant.	
<b>Public Notice Period</b> = 8/27/2013 to 9/10/2013	
<b>Public Notice Date + 3 days = 17 days =</b> 9/13/2013	

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
  - (1) construction of a PSD source or PSD modification;
  - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
  - (3) any modification subject to 326 IAC 2-4.1.
- (c) Public notice comment period is 14 calendar days.

**Instructions: Check (✓) appropriate answers and make a recommendation.**

1. Did the applicant submit a written petition for an interim significant permit revision or significant source modification?
  - ☒ Yes Go to question 2.
  - ☐ No Ignore verbal request.
2. Did the applicant pay the applicable interim permit fee? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.
  - ☒ Yes Go to question 3.
  - ☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).

Comments: \_\_\_\_\_
3. Did the applicant state acceptance of federal enforceability of an interim significant permit revision or significant source modification?
  - ☒ Yes Go to question 4.
  - ☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).
4. Did the applicant or its authorized agent sign the application?
  - ☒ Yes Go to question 5.
  - ☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).

5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim significant permit revision or significant source modification is issued), including, but not limited to:
- (a) Financial risk,
  - (b) Risk that additional emission controls may be required,
  - (c) Risk that the final significant permit revision or significant source modification may be denied.
- ☒ Yes Go to question 6.  
☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).
6. Did the applicant begin construction prior to submitting the interim significant permit revision or significant source modification application?
- ☐ Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).  
☒ No Go to question 7.
7. What is the type of the interim construction?
- ☐ New Source Deny the application, pursuant to 326 IAC 2-13-1(a)  
☒ Modification to an existing source Go to question 8.
8. Did the applicant present data in the interim significant permit revision or significant source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?
- ☒ Yes Go to question 9.  
☐ No Deny the application pursuant to:  
326 IAC 2-13-1(c)(2)(B), for PSD;  
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;  
326 IAC 2-13-1(c)(2)(C), for state rules.
9. Is the proposed modification to be located in a nonattainment area?
- ☐ Yes Go to question 10.  
☒ No Go to question 11.
- County: Hancock County
- Comments: \_\_\_\_\_
10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?
- ☐ Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).  
☐ No Go to question 11.
11. Did the petition include a complete description of the process?
- ☒ Yes Go to question 12.  
☐ No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2).
12. Did the interim significant permit revision or significant source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.
- ☒ Yes Go to question 13.  
☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

13. Do the emission controls and/or throughput limits prevent PSD applicability?  
☒ Yes Go to question 14.  
☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?  
☒ Yes Go to question 15.  
☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?  
☒ Yes Go to question 16.  
☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?  
☒ Yes Go to question 17.  
☐ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
17. Does the applicant dispute applicability of any applicable state or federal rule?  
☐ Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).  
☒ No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim significant permit revision or significant source modification petition?  
☐ Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).  
☒ No Go to question 19.
19. Is there good reason to believe that information in the petition has been falsified?  
☐ Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).  
☒ No Approve the interim significant permit revision or significant source modification petition.
20. Has the petition been adequately public noticed? A proof of publication copy is necessary.  
☒ Yes Go to question 21.  
☐ No Deny the application, pursuant to 326 IAC 2-13-1(e).
- Newspaper: Daily Reporter
- Date of publication: 8/27/2013
21. Were comments received within seventeen (17) days after the public notice of the interim significant permit revision or significant source modification?  
(14 calendar days for comment period + 3 working days for mailing)  
☐ Yes Evaluate the comments received, and make a recommendation.  
☒ No Issue the final interim significant permit revision or significant source modification approval.

Comments: \_\_\_\_\_  
\_\_\_\_\_

Recommendation: \_\_\_\_\_

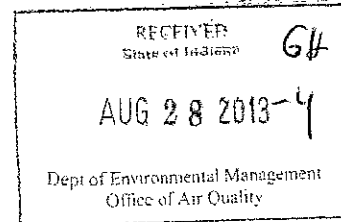
Date the applicant was informed of the decision: \_\_\_\_\_

Method of informing the applicant: \_\_\_\_\_



August 27, 2013

IDEM Air Permits Administration  
ATTN: Incoming Application  
100 North Senate Avenue  
Mail Code 61-53  
Indianapolis, IN 46204-2251



Re: CLM Pallet Recycling, Inc.  
Source ID: 059-00037

Dear Sir or Madam:

Cornerstone Environmental, Health and Safety, Inc. (Cornerstone) is contracted to assist CLM Pallet Recycling, Inc. with a permit modification application. CLM Pallet Recycling, Inc. requests an Interim Approval permit for the proposed request to add four wood gasification units with thermal oxidizers. Based on 8,760 hours per year of operation, the CO, VOC, PM10, PM2.5, NOx and SO2 emissions are 40.0, 3.24, 2.52, 2.52, 33.2, and 0.20 tons per year, respectively.

CLM Pallet Recycling, Inc. requests that IDEM use the permit application materials that have been provided for the four wood gasification units as the basis for the review and approval of the Interim Permit request.

Attached please find a separate Air Permit Application Cover Sheet and IDEM Form GSD-01 as requested.

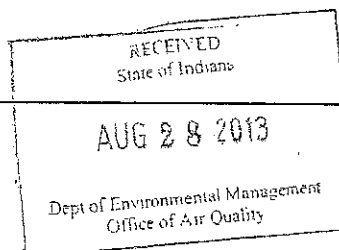
Sincerely,

A handwritten signature in black ink, appearing to read "Walter Koucky".

Walter Koucky  
Senior Air Project Manager

# Indiana Department of Environmental Management Office of Air Quality

<b>Interim Petition Checklist</b>	
<b>Instructions:</b> (a) Please answer yes or no. (b) Enclosed this checklist with the completed interim petition package.	
<b>Company Name:</b> CLM Pallet Recycling, Inc.	
<b>Location:</b> 3103 W. 1000 N. Fortville, IN 46040	
Yes	1. Is the written interim petition prepared?
Yes	2. Is the written petition signed and dated?
Yes	3. Is the public notice drafted?
Yes	4. Is the filing and review fee enclosed? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.
Yes	5. Is the account number written on the check or money order?
Yes	6. Is the Affidavit of Construction signed, dated, and notarized?
Yes	7. Is the proposed modification/revision described in detail?
Yes	8. Is the proposed modification/revision a modification or addition to an existing source?
Yes	9. Is the proposed modification/revision located in an attainment area for all the criteria pollutants?
No	10. Is the proposed modification/revision located in a nonattainment area? If yes, answer No. 11.
N/A	11. Is the pollutant, which the nonattainment designation is based on, going to be emitted in this proposed modification/revision?
Yes	12. Are potential emissions calculated?
Yes	13. Is federal enforceability consent specifically indicated?
N/A	14. Are specific conditions, limitations, and/or restrictions included that preclude applicability of PSD?
N/A	15. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NSPS?
N/A	16. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NESHAP?
Yes	17. Are specific conditions, limitations, and/or restrictions included that assure compliance with all applicable state air pollution rules?
Yes	18. Has a regular modification/revision permit application been submitted to OAQ?
No	19. Has the proposed modification/revision commenced prior to the submission of the interim permit petition?
	20. The interim petition comment period has been decided to be: <u>14 calendar days</u>
<b>Additional Comments:</b>	





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

**PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION, SIGNIFICANT SOURCE  
MODIFICATION, MINOR PERMIT REVISION, OR MINOR SOURCE MODIFICATION**

Source Name: CLM Pallet Recycling, Inc.

Source Address: 3103 W. 1000 N. Fortville, Indiana 46040

Mailing Address: 3103 W. 1000 N. Fortville, Indiana 46040

SIC/NAICS Code: 2448/ 321920

**Description of the Operation or Equipment:**

CLM Pallet currently takes used pallets and reconstructs them to return to useful service. Unusable pieces or pallets are currently ground, dyed and recycled into mulch. CLM proposes to construct four (4) wood gasification units with thermal oxidizers and heat recovery for electrical generation. The intent is to convert from recycling unusable wood pallet components to make mulch to beneficial use of the scrap pallet material as a source of recovered bioenergy. This is intended to eliminate the need for piles of mulch on premises in the future.

**Potential to Emit:**

**Plantwide Totals**

	Propane Fired	Fugitive	Total
Nox tpy @ 8760 hr/yr	50.4		50.4
SO2 tpy @ 8760 hr/yr	0.1		0.1
CO tpy @ 8760 hr/yr	39.9		39.9
CO2 tpy @ 8760 hr/yr	46,794.20		46794.2
PM10/2.5 tpy @ 8760 hr/yr	2.6	4.22	6.82
VOC	3.2		3.2
HAP	0.2		0.2

Supporting calculations are included in Attachment 1

PSD Requirements:

The existing source was a FESOP, emissions are being decreased by removing grinders from the permit. The revised source with the addition of the biogas combustion units will be an MSOP. The existing source, the modification and the revised MSOP source all have emissions levels below PSD applicability levels and the source is not subject to PSD review.

NSPS Requirements:

The four biogasification combustion units are exempt from the Commercial and Industrial Solid Waste Incineration Rule 40 CFR 60 Subpart CCCC as cogeneration and electrical generation units using a homogeneous material as fuel. These units also qualify for exemption as chemical recovery units recovering charcoal.

A small research unit is exempt from Commercial and Industrial Solid Waste Incineration Rule 40 CFR 60 Subpart CCCC as a laboratory Analysis Unit that burns samples of materials for the purpose of chemical or physical analysis.

NESHAP Requirements:

There is no NESHAP rule applicable to this operation or equipment.

State Rules & Requirements:

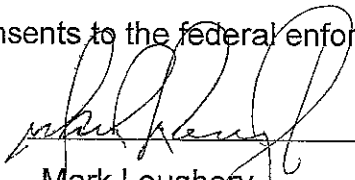
The four biogasification units perform pyrolysis of wood and waste wood in an oxygen deprived environment to create biogas. The biogas is subsequently oxidized in a second stage high-efficiency oxidizer with thermal recovery. As this could be defined as incineration, CLM asserts these units meet the requirements of 326 IAC 4-2.

Federal Enforceability:

The company consents to the federal enforceability of this interim petition.

Signature

Printed Name:

  
Mark Loughery

Title or Position

CFO

Phone Number:

(317) 351-6912

Date:

8/23/13

**Affidavit of Construction**

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

1. I live in Marion County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of Chief Financial Officer for CLM Pallet Recycling, Inc.  
(Company Name)
3. By virtue of my position with CLM Pallet Recycling Inc., I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of CLM Pallet Recycling Inc.  
(Company Name)
4. I, the undersigned, have submitted an interim (minor permit revision, significant permit revision, minor source modification, significant source modification) petition to the Office of Air Quality for the construction of four wood gasification units with thermal oxidizers
5. CLM Pallet Recycling Inc. (Company Name)

recognizes the following risks:

- (a) own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and  
(d) any additional air permitting requirements.

Further Affiant said not.

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

Signature: Mark Loughery

Printed Name: Mark Loughery

Phone No.: 317-351-2200

Date: 8/23/13

STATE OF INDIANA)

)SS  
COUNTY OF Marion )

Subscribed and sworn to me, a notary public in and for Marion County  
and State of Indiana on this 23<sup>rd</sup> day of August, 20 13.  
My Commission expires: 12-16-14

Signature: Nancy E. Downey

Printed Name: \_\_\_\_\_

**NANCY E. DOWNEY  
A NOTARY PUBLIC**

Within and for the county of Marion & the  
State of Indiana. My Commission expires  
December 16, 2014

1 drp

**NOTICE OF 14-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of Interim Significant Permit Revision/Significant Source Modification  
for **CLM Pallet Recycling, Inc.**  
in **Hancock County**

Notice is hereby given that the above company located at (3103 W. 1000 N. Fortville), Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct four (4) wood gasification units with thermal oxidizers as air pollution control. Based on 8,760 hours per year of operation, the CO, VOC, PM10, PM2.5, NOx and SO2 emissions are 40.0, 3.24, 2.52, 2.52, 33.2, and 0.20 tons per year, respectively.

The company has submitted an application for a significant permit revision. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Fortville Public Library, 625 East Broadway in Fortville, IN.** All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251.

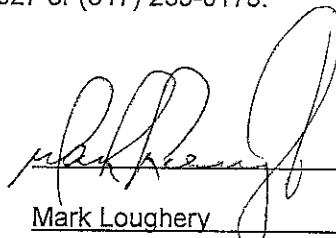
Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Company Official's Signature:

Company Official's Printed Name:

Company Name:

  
\_\_\_\_\_  
Mark Loughery  
\_\_\_\_\_  
CLM Pallet Recycling, Inc.  
\_\_\_\_\_

**NOTICE OF 14-DAY  
PERIOD FOR  
PUBLIC COMMENT**

Proposed Approval of Interim Significant Permit Revision for CLM Pallet Recycling, Inc.

Notice is hereby given that the above company located at 3103 W. 1000 N Fortville, IN has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct four wood gasification units with thermal oxidizers as air pollution control. Based on 8,760 hours per year of operation, the CO, VOCs, PM10, PM2.5, NOx, and SO2 emissions are 40.0, 3.24, 2.62, 2.62, 33.2, and 0.20 tons per year, respectively.

The company has submitted an application for a significant permit revision. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the Fortville Public Library, 825 East Broadway in Fortville, IN. All comments, along with supporting documentation, should be submitted in writing to IDEM, OAQ, 100 North Senate Ave, MC 81-53, Room 1003, Indianapolis, IN 46204-2251.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter, and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to IDEM, OAQ, 100 North Senate Ave, MC 81-53, Room 1003, Indianapolis, IN 46204-2251 or call (800) 451-6027 or (317) 233-0178.

August 27, 2013 hspaxp

**PROOF OF PUBLICATION**

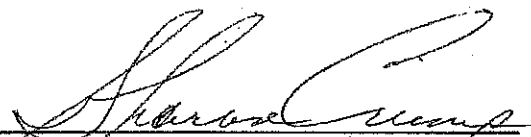
STATE OF INDIANA,}

} SS:

HANCOCK COUNTY, }

BE IT REMEMBERED, That on this 27th day of August, 2013, personally came the undersigned, Sharon Crump of the DAILY REPORTER, a daily newspaper of general circulation in said County and State, published in the City of Greenfield, County and State aforesaid, whom on her oath, says the notice hereunto attached was published in said paper once each week for one weeks the first of said publication being on the 27th of August, 2013. And further deponent says not.

The undersigned further states that the DAILY REPORTER newspaper maintains an Internet website, located at [www.greenfieldreporter.com](http://www.greenfieldreporter.com) and that a copy of the above referenced printed matter was posted on such website on the date(s) of publication set forth above.

  
SHARON CRUMP

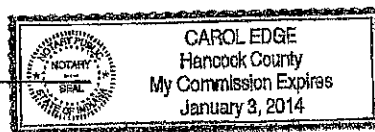
Subscribed and sworn to before me this 27th day of August, 2013.



Carol Edge, Notary

My Commission Expires January 3, 2014

My County of Residence is Hancock





**AIR PERMIT APPLICATION COVER SHEET**  
State Form 50639 (R4 / 1-10)  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch  
100 N. Senate Avenue, MC 61-53 Room 1003  
Indianapolis, IN 46204-2251  
Telephone: (317) 233-0178 or  
Toll Free: 1-800-451-6027 x30178 (within Indiana)  
Facsimile Number: (317) 232-6749  
[www.IN.gov/idem](http://www.IN.gov/idem)

**NOTES:**

- The purpose of this cover sheet is to obtain the core information needed to process the air permit application. This cover sheet is required for all air permit applications submitted to IDEM, OAQ. Place this cover sheet on top of all subsequent forms and attachments that encompass your air permit application packet.
- Submit the completed air permit application packet, including all forms and attachments, to IDEM Air Permits Administration using the address in the upper right hand corner of this page.
- IDEM will send a bill to collect the filing fee and any other applicable fees.
- Detailed instructions for this form are available on the Air Permit Application Forms website.

**FOR OFFICE USE ONLY**

PERMIT NUMBER:

DATE APPLICATION WAS RECEIVED:

RECEIVED  
State of Indiana

AUG 28 2013

Dept of Environmental Management  
Office of Air Quality

1. Tax ID Number: [REDACTED]

**PART A: Purpose of Application**

Part A identifies the purpose of this air permit application. For the purposes of this form, the term "source" refers to the plant site as a whole and NOT to individual emissions units.

2. Source / Company Name: CLM Pallet Recycling, Inc.

3. Plant ID: 059 – 0037

4. Billing Address: 3103 W. 1000 N.

City: Fortville

State: IN

ZIP Code: 46040 –

5. Permit Level: ☐ Exemption ☐ Registration ☐ SSOA ☒ MSOP ☐ FESOP ☐ TVOP ☐ PBR

6. Application Summary: Check all that apply. Multiple permit numbers may be assigned as needed based on the choices selected below.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Initial Permit              | <input type="checkbox"/> Renewal of Operating Permit        | <input type="checkbox"/> Asphalt General Permit            |
| <input type="checkbox"/> Review Request              | <input type="checkbox"/> Revocation of Operating Permit     | <input type="checkbox"/> Alternate Emission Factor Request |
| <input checked="" type="checkbox"/> Interim Approval | <input type="checkbox"/> Relocation of Portable Source      | <input type="checkbox"/> Acid Deposition (Phase II)        |
| <input type="checkbox"/> Site Closure                | <input type="checkbox"/> Emission Reduction Credit Registry |  |

☒ Transition (between permit levels) From: FESOP To: MSOP

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Administrative Amendment: | <input type="checkbox"/> Company Name Change                     | <input type="checkbox"/> Change of Responsible Official |
|  | <input type="checkbox"/> Correction to Non-Technical Information | <input type="checkbox"/> Notice Only Change             |
|  | <input type="checkbox"/> Other (specify):                        |   |

- ☒ Modification:
- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> New Emission Unit or Control Device          | <input type="checkbox"/> Modified Emission Unit or Control Device        |  |
| <input type="checkbox"/> New Applicable Permit Requirement                       | <input type="checkbox"/> Change to Applicability of a Permit Requirement |  |
| <input type="checkbox"/> Prevention of Significant Deterioration                 | <input type="checkbox"/> Emission Offset                                 | <input type="checkbox"/> MACT Preconstruction Review |
| <input type="checkbox"/> Minor Source Modification                               | <input type="checkbox"/> Significant Source Modification                 |  |
| <input type="checkbox"/> Minor Permit Modification                               | <input type="checkbox"/> Significant Permit Modification                 |  |
| <input checked="" type="checkbox"/> Other (specify): Significant Permit Revision |  |  |

7. Is this an application for an initial construction and/or operating permit for a "Greenfield" Source? ☐ Yes ☒ No

8. Is this an application for construction of a new emissions unit at an Existing Source? ☒ Yes ☐ No

### PART B: Pre-Application Meeting

Part B specifies whether a meeting was held or is being requested to discuss the permit application.

9. Was a meeting held between the company and IDEM prior to submitting this application to discuss the details of the project?

☐ No ☒ Yes: Date: 05/9/2013 phone

10. Would you like to schedule a meeting with IDEM management and your permit writer to discuss the details of this project?

☒ No ☐ Yes: Proposed Date for Meeting:

### PART C: Confidential Business Information

Part C identifies permit applications that require special care to ensure that confidential business information is kept separate from the public file.

Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in the Indiana Administrative Code (IAC). To ensure that your information remains confidential, refer to the IDEM, OAQ information regarding submittal of confidential business information. For more information on confidentiality for certain types of business information, please review IDEM's Nonrule Policy Document Air-031-NPD regarding Emission Data.

11. Is any of the information contained within this application being claimed as **Confidential Business Information**?

☒ No ☐ Yes

### PART D: Certification Of Truth, Accuracy, and Completeness

Part D is the official certification that the information contained within the air permit application packet is truthful, accurate, and complete. Any air permit application packet that we receive without a signed certification will be deemed incomplete and may result in denial of the permit.

For a Part 70 Operating Permit (TVOP) or a Source Specific Operating Agreement (SSOA), a "responsible official" as defined in 326 IAC 2-7-1(34) must certify the air permit application. For all other applicants, this person is an "authorized Individual" as defined in 326 IAC 2-1.1-1(1).

☒ I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Mark Loughery  
Name (typed)

Chief Financial Officer  
Title

Signature

Date

8/23/13



**OAQ GENERAL SOURCE DATA APPLICATION**  
**GSD-01: Basic Source Level Information**  
State Form 50640 (R5 / 1-10)  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

State of Indiana  
AUG 28 2013  
Dept of Environmental Management  
Office of Air Quality

IDEM – Office of Air Quality – Permits Branch  
100 N. Senate Avenue, MC 61-53 Room 1003  
Indianapolis, IN 46204-2251  
Telephone: (317) 233-0178 or  
Toll Free: 1-800-451-6027 x30178 (within Indiana)  
Facsimile Number: (317) 232-6749  
[www.IN.gov/idem](http://www.IN.gov/idem)

- NOTES:**
- The purpose of GSD-01 is to provide essential information about the entire source of air pollutant emissions. GSD-01 is a required form.
  - Detailed instructions for this form are available on the Air Permit Application Forms website.
  - All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. Failure to follow these requirements exactly will result in your information becoming a public record, available for public inspection.

**PART A: Source / Company Location Information**

1. Source / Company Name: CLM Pallet Recycling, Inc.		2. Plant ID: 059 – 00037	
3. Location Address: 3103 W. 1000 N.			
City: Fortville		State: IN	ZIP Code: 46040 –
4. County Name: Hancock		5. Township Name: Vernon	
6. Geographic Coordinates:			
Latitude: 39.927526		Longitude: 85.828673	
7. Universal Transferal Mercadum Coordinates (if known):			
Zone:		Horizontal:	Vertical:
8. Adjacent States: Is the source located within 50 miles of an adjacent state?			
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – Indicate Adjacent State(s): <input type="checkbox"/> Illinois (IL) <input type="checkbox"/> Michigan (MI) <input type="checkbox"/> Ohio (OH) <input type="checkbox"/> Kentucky (KY)			
9. Attainment Area Designation: Is the source located within a non-attainment area for any of the criteria air pollutants?			
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – Indicate Nonattainment Pollutant(s): <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> O <sub>3</sub> <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> SO <sub>2</sub>			
10. Portable / Stationary: Is this a portable or stationary source? <input type="checkbox"/> Portable <input checked="" type="checkbox"/> Stationary			

**PART B: Source Summary**

11. Company Internet Address (optional):
12. Company Name History: Has this source operated under any other name(s)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – Provide information regarding past company names in Part I, Company Name History.
13. Portable Source Location History: Will the location of the portable source be changing in the near future? <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> No <input type="checkbox"/> Yes – Complete Part J, Portable Source Location History, and Part K, Request to Change Location of Portable Source.
14. Existing Approvals: Have any exemptions, registrations, or permits been issued to this source? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – List these permits and their corresponding emissions units in Part M, Existing Approvals.
15. Unpermitted Emissions Units: Does this source have any unpermitted emissions units? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – List all unpermitted emissions units in Part N, Unpermitted Emissions Units.
16. New Source Review: Is this source proposing to construct or modify any emissions units? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – List all proposed new construction in Part O, New or Modified Emissions Units.
17. Risk Management Plan: Has this source submitted a Risk Management Plan? <input checked="" type="checkbox"/> Not Required <input type="checkbox"/> No <input type="checkbox"/> Yes → Date submitted: EPA Facility Identifier: – –



### PART G: Agent Information

40. <b>Company Name of Agent:</b> Cornerstone Environmental, Health & Safety, Inc.		
41. <b>Type of Agent:</b> <input checked="" type="checkbox"/> Environmental Consultant <input type="checkbox"/> Attorney <input type="checkbox"/> Other (specify):		
42. <b>Name of Agent Contact Person:</b> Walter Koucky		
43. <b>Mailing Address:</b> 880 Lennox Court		
<b>City:</b> Zionsville	<b>State:</b> IN	<b>ZIP Code:</b> 46077 – 9179
44. <b>Electronic Mail Address (optional):</b> wkoucky@corner-enviro.com		
45. <b>Telephone Number:</b> ( 317 ) 733 – 2637		46. <b>Facsimile Number (optional):</b> ( 866 ) 891 – 3901
47. <b>Request for Follow-up:</b> Does the "Agent" wish to receive a copy of the preliminary findings during the public notice period (if applicable) and a copy of the final determination? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes		

### PART H: Local Library Information

48. <b>Date application packet was filed with the local library:</b>		
49. <b>Name of Library:</b> Fortville Public Library		
50. <b>Name of Librarian (optional):</b>		
51. <b>Mailing Address:</b> 625 East Broadway		
<b>City:</b> Fortville	<b>State:</b> IN	<b>ZIP Code:</b> 46040 –
52. <b>Internet Address (optional):</b> www.fortville.lib.in.us		
53. <b>Electronic Mail Address (optional):</b>		
54. <b>Telephone Number:</b> ( 317 ) 485 – 6402		55. <b>Facsimile Number (optional):</b> ( ) –

### PART I: Company Name History (if applicable)

Complete this section only if the source has previously operated under a legal name that is different from the name listed above in Section A.

56. <b>Legal Name of Company</b>	57. <b>Dates of Use</b>
N/A	to
	to
	to
	to
	to
	to
	to
	to
	to
	to
58. <b>Company Name Change Request:</b> Is the source officially requesting to change the legal name that will be printed on all official documents issued by IDEM, OAQ? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – <b>Change Company Name to:</b>	

### PART L: Source Process Description

Complete this section to summarize the main processes at the source.

64. Process Description	65. Products	66. SIC Code	67. NAICS Code
Wood Pallet Recycling Operation	Wood Pallets	2448	321920

### PART M: Existing Approvals (if applicable)

Complete this section to summarize the approvals issued to the source since issuance of the main operating permit.

68. Permit ID	69. Emissions Unit IDs	70. Expiration Date

### PART N: Unpermitted Emissions Units (if applicable)

Complete this section only if the source has emission units that are not listed in any permit issued by IDEM, OAQ.

71. Emissions Unit ID	72. Type of Emissions Unit	73. Actual Dates		
		Began Construction	Completed Construction	Began Operation
L1	One Laboratory Test Unit, was considered exempt at Aemerge; now on permit at CLM under single source determination (pallet processing will make Aemerge and CLM a single source)			1/1/2013

### PART O: New or Modified Emissions Units (if applicable)

Complete this section only if the source is proposing to add new emission units or modify existing emission units.

74. Emissions Unit ID	75. NEW	76. MOD	77. Type of Emissions Unit	78. Estimated Dates		
				Begin Construction	Complete Construction	Begin Operation
E4, E5, E6, E7	X		Wood Gasifier with Thermal Oxidizer	8/1/2013		10/1/2013
L1	X		Laboratory Test Unit w/ Flare			10/1/2013

**Plantwide Totals**

	<b>Propane Fired</b>	<b>Fugitive</b>	<b>Total</b>
Nox tpy @ 8760 hr/yr	50.40		50.40
SO2 tpy @ 8760 hr/yr	0.10		0.10
CO tpy @ 8760 hr/yr	39.90		39.90
CO2 tpy @ 8760 hr/yr	46794.20		46794.20
PM10/2.5 tpy @ 8760 hr/yr	2.60	4.22	6.82
VOC	3.20		3.20
HAP	0.20		0.20
<b>Total</b>	<b>46890.60</b>	<b>4.22</b>	<b>46894.82</b>

**Summary of Fugitive Emissions**

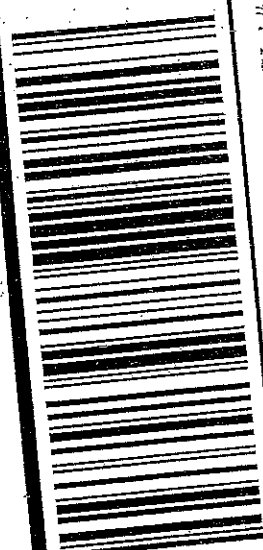
	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>
Unpaved Roads	3.61	0.67	0.07
Paved Roads	0.57	0.11	0.03
Grinder	3.94	2.37	2.37
Storage Piles	1.06	1.06	1.06
Transfer/Loading	0.01	0.01	0.01
<b>Total</b>	<b>9.19</b>	<b>4.22</b>	<b>3.53</b>

These terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the  
 and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the  
 010195103 1/10 BL United Parcel Service, Louisville, KY

120001


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BILLING: P/P

Reference#1: 2850-8578-4  
 Reference#2: IDEM - Permit Modification  
 US 15609 WNTNVS0 36 0A 01/2013



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 100 N SENATE AVE  
 INDIANAPOLIS IN 46204-2013

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**ALEX - 4000**

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## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

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

TO: Mark Loughery  
CLM Pallet Recycling, Inc.  
3103 W 1000 N  
Fortville, IN 46040

DATE: September 16, 2013

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

SUBJECT: Final Decision  
Interim Significant Permit Revision Petition Approval  
059-33390i-00037

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:  
Walter Koucky, Cornerstone Environmental  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013


# Mail Code 61-53

IDEM Staff	VHAUN 9/16/2013 CLM Pallet Recycling, Inc. 059-33390i-00037 FINAL			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Mark Loughery CLM Pallet Recycling, Inc. 3103 W 1000 N Fortville IN 46040 (Source CAATS)	Confirmed Delivery								
2		Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official)									
3		Hancock County Health Department 111 America Legion Greenfield IN 46140-2365 (Health Department)									
4		Fortville Town Council 714 E. Broadway Fortville IN 46040 (Local Official)									
5		Charles Reece/ Karen Knox 16592 E 96th St Fortville IN 46040 (Affected Party)									
6		Les & Janet Whelchel 16542 E 96th St Fortville IN 46040 (Affected Party)									
7		Rick & Cynthia Fox Fox Communications, Inc 16520 E 96th St Fortville IN 46040 (Affected Party)									
8		Greg Kellow 16498 E 96th St Fortville IN 46040 (Affected Party)									
9		Thomas Cairns 19498 E 96th St Fortville IN 46040 (Affected Party)									
10		Charles Royce 16566 E 96th St Fortville IN 46040 (Affected Party)									
11		Hancock Physicians Network 600 Vitality Dr Fortville IN 46040 (Affected Party)									
12		The Bridge Church 611 Vitality Dr Fortville IN 46040 (Affected Party)									
13		David Crowe 3297 W 1000 N Fortville IN 46040 (Affected Party)									
14		Dale Leonard 3193 W 1000 N Fortville IN 46040 (Affected Party)									
15		Timothy Scroggins 3171 W 1000 N Fortville IN 46040 (Affected Party)									

Total number of pieces Listed by Sender  <div style="font-size: 48pt; font-weight: bold;">14</div>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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# Mail Code 61-53

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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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Walter Cornerstone Environmental 880 Lennox Court Zionsville IN 46077 (Consultant)									
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender  <b>1</b>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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