



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: October 7, 2014

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

Source Name: Koetter Woodworking, Inc.

Permit Level: Significant Permit Modification

Permit Number: 019-34548-00079

Source Location: 533 Louis Smith Road Borden, Indiana

Type of Action Taken: Revisions to permit requirements
Changes that are administrative in nature

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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34548.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Kory Byrne
Koetter Woodworking, Inc.
533 Louis Smith Road
Borden, IN 47106

October 7, 2014

Re: 019-34548-00079
Significant Permit Modification to
Part 70 Renewal No. T019-31019-00079

Dear Kory Byrne:

Koetter Woodworking, Inc. was issued a Part 70 Operating Permit Renewal No. T019-31019-00079 on November 27, 2012 for a stationary saw and millwork facility and a wood molding production plant located at 533 Louis Smith Road, Borden, IN 47106. An application requesting changes to this permit was received on May 19, 2014. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as amended. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this amendment:

- Attachment A: 40 CFR 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
- Attachment B: 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>. 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 Dominic Williams of my staff, at 317-234-6555 or 1-800-451-6027, and ask for extension 4-6555.

Sincerely,

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

Attachment(s): Updated Permit, Technical Support Document and Appendix A
NB/DW

cc: File - Clark County
Clark County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Southeast Regional Office





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Commissioner

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Koetter Woodworking, Inc.
533 Louis Smith Road
Borden, Indiana 47106**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Part 70 Operating Permit No. T019-31019-00079	
Original signed by: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: November 27, 2012 Expiration Date: November 27, 2017


First Significant Permit Modification No. T019-34548-00079	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 7, 2014 Expiration Date: November 27, 2017

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary saw and millwork facility and a wood molding production plant.

Source Address:	533 Louis Smith Road, Borden, Indiana 47106
General Source Phone Number:	812-923-4508
SIC Code:	2426
County Location:	Clark
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 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 [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2. Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ, this is an affected unit.
- (b) One (1) vacuum coating system (identified as unit EU-02), constructed in 1996, with a maximum throughput rate of 12,000 linear feet of wood molding per hour, using a flow-coating application method.
- (c) Woodworking operations (identified as WW1), constructed in the 1960s and modified in 1996, with a maximum process rate of 31,047 pounds of wood per hour. Particulate matter emissions are controlled by ten (10) baghouses (identified as DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7).
- (d) Mill and saw-work activities, constructed in the 1960s, including:
 - (1) Lumber processing conducted in building No. 2, with a maximum throughput capacity of 17,308 pounds of lumber per hour.
 - (2) Waste lumber processing conducted in building No. 2, with a maximum throughput capacity of 1,731 pounds per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) A petroleum fuel, other than gasoline, dispensing facility, each having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day [326 IAC 8-9], including:
 - (1) One (1) 500 gallon storage tank (identified as Tank 9) constructed in 2000.
 - (2) Two (2) 1,000 gallon storage tanks (identified as Tanks 1 and 2) constructed in 1992.
 - (3) One (1) 1,000 gallon storage tank (identified as Tank 15B) constructed in 2000.
 - (4) Ten (10) 1,000 gallon storage tanks (identified as Tank 3 through Tank 8, Tank 10 through Tank 12, and Tank 15A) constructed in 2001.
- (b) Propane or liquid petroleum gas, or butane-fired combustion units with heat input of equal to or less than six million (6,000,000) Btu per hour [326 IAC 6.5-1-2(b)], including:
 - (1) One (1) propane boiler, with a maximum heat input capacity of 2 MMBtu per hour.
 - (2) One (1) propane oven, with a maximum heat input capacity of 0.66 MMBtu per hour.
- (c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21, with each baghouse exhausting to the indoors. [326 IAC 6.5-1-2(a)]
- (d) Emission units and activities whose potential uncontrolled emissions equal to or less than 0.6 ton per year of lead (3.29 pounds per day), 5 pounds per hour of sulfur dioxide (25 pounds per day), 5 pounds per hour of nitrogen oxides (25 pounds per day), 25 pounds per day of carbon monoxide, 5 pounds per hour of PM₁₀ (25 pounds per day), 3 pounds per hour of volatile organic compounds (15 pounds per day), including:
 - (1) Sawdust handling and storage with maximum throughput capacity of 361 pounds of sawdust per hour. [326 IAC 6.5-1-2(a)]
 - (2) Truck loading with a maximum throughput capacity of 5,192 pounds of waste per hour. [326 IAC 6.5-1-2(a)]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T019-31019-00079, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, 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 [326 IAC 2-7-7] [IC 13-17-12]

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 [326 IAC 2-7-5(5)]

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 [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (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 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T019-31019-00079 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 nine (9) months 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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs

[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) 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.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [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 2-7-5(1)]

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

C.2 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.3 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.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-6(1)]

C.6 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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.7 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded

during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.9 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (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 [326 IAC 2-7-5][326 IAC 2-7-6]

C.10 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.12 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

- (l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
- (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 - (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
 - (d) Elements of a QIP:

The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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 Part 70 permit.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 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[40 CFR 64][326 IAC 3-8]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- 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) 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.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1

FACILITY OPERATION CONDITIONS

Emissions Unit Description:

Reserved.

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

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ, this is an affected unit.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

Pursuant to 326 IAC 6.5-1-2(b)(1)(B), the particulate matter emissions from the 29.9 MMBtu per hour boiler shall not exceed 0.35 pounds per million Btu.

D.2.2 Special Conditions to avoid NSPS 40 CFR 60, Subpart E, Cb and NESHAP 40 CFR 63, Subpart EEE

- (a) The Permittee shall use only clean paper, including shredded currency, which is not contaminated with other types of waste as a supplemental fuel for the 2.5 MMBtu per hour boiler identified as EU-01B.

- (b) The Permittee shall use only the following material as solid fuel for the boilers identified as EU-01A and EU-01B:

Clean wood, which includes only uncoated, unpainted and untreated: wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials.

Compliance with this limit ensures that the boilers at which the wood material is burned do not meet the definition of Municipal waste combustor under NSPS, Subpart Cb. Therefore, NSPS, Subpart Cb does not apply to the boilers.

Compliance with this limit ensures that the wood material burned at the boilers does not meet the definition of solid waste under NSPS, Subpart E. Therefore, NSPS, Subpart E does not apply to the boilers.

Compliance with this limit ensures that the boilers at which the wood material is burned do not meet the definition of Hazardous waste solid fuel boiler under NESHAP, Subpart EEE. Therefore, NESHAP, Subpart EEE does not apply to the boilers.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and the associated control devices. 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.2.4 Particulate

In order to comply with Condition D.2.1, the cyclone used for particulate control shall be in operation at all times when the 29.9 MMBtu per hour boiler is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the boiler stack exhausts 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.2.6 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 line. 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 B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per day. 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) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall maintain the following records:
 - (1) Monthly fuel records.
 - (2) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period.
- (c) Pursuant to 326 IAC 12, the Permittee shall maintain daily records of the amounts of each fuel combusted. This requirement is not federally enforceable.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) vacuum coating system (identified as unit EU-02), constructed in 1996, with a maximum throughput rate of 12,000 linear feet of wood molding per hour, using a flow-coating application method.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (c) Woodworking operations, identified as WW1, constructed in the 1960s and modified in 1996, with a maximum process rate of 31,047 pounds of wood per hour. Particulate matter emissions are controlled by ten (10) baghouses, identified as DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7.
- (d) Mill and saw-work, constructed in the 1960s, activities including:
 - (1) Lumber processing conducted in building No. 2, with a maximum throughput capacity of 17,308 pounds of lumber per hour.
 - (2) Waste lumber processing conducted in building No. 2, with a maximum throughput capacity of 1,731 pounds per hour.

Insignificant Activities

- (c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21, with each baghouse exhausting to the indoors. [326 IAC 6.5-1-2(a)]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter Limitation [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the woodworking operations identified as WW1 and the insignificant grinding and machining operations shall not exceed 0.03 grain per dry standard cubic foot.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and the associated control devices. 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.4.3 Particulate

- (a) In order to comply with Condition D.4.1, the baghouses used for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking, grinding, and machining operations are 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 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.4 Visible Emissions Notations [40 CFR Part 64]

- (a) Visible emission notations of the woodworking stack exhausts for baghouses DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7 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.4.5 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall record the pressure drop across the baghouses (DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7) used in conjunction with the woodworking operations WW1 at least once per week when the woodworking operations are in operation when venting to the atmosphere. When for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for each of these baghouses is a pressure drop between 1 and 5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside this range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the baghouses (DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21) used in conjunction with the grinding and machining operation at least once per week when the grinding and machining operations are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for each of these baghouses is a pressure drop between 1 and 4 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside this range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.4.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit 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 emission 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 B - Emergency Provisions).

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

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts associated with the woodworking operations WW1. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.4.5, the Permittee shall maintain weekly records of the pressure drop across the baghouses used in conjunction with the woodworking operations WW1 and the machining and grinding operations at least once per week when these operations are in operation. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (a) A petroleum fuel, other than gasoline, dispensing facility, each having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day [326 IAC 8-9], including:
- (1) One (1) 500 gallon storage tank (identified as Tank 9) constructed in 2000.
 - (2) Two (2) 1,000 gallon storage tanks (identified as Tanks 1 and 2) constructed in 1992.
 - (3) One (1) 1,000 gallon storage tank (identified as Tank 15B) constructed in 2000.
 - (4) Ten (10) 1,000 gallon storage tanks (identified as Tank 3 through Tank 8, Tank 10 through Tank 12, and Tank 15A) constructed in 2001.

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

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-9]

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the Permittee of a stationary vessel with a capacity of less than thirty-nine thousand (39,000) gallons, and which is not exempt, shall maintain a record and submit to the department a report containing the following information for each vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

The Permittee shall keep all records as described for the life of the vessel. Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (b) Propane or liquid petroleum gas, or butane-fired combustion units with heat input of equal to or less than six million (6,000,000) Btu per hour [326 IAC 6.5-1-2(b)], including:
- (1) One (1) propane boiler, with a maximum heat input capacity of 2 MMBtu per hour.
 - (2) One (1) propane oven, with a maximum heat input capacity of 0.66 MMBtu per hour.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

Pursuant to 326 IAC 6.5-1-2(b), the particulate matter emissions from the propane-fired boiler and oven shall not exceed 0.15 pounds per million Btu.

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (d) Emission units and activities whose potential uncontrolled emissions equal to or less than 0.6 ton per year of lead (3.29 pounds per day), 5 pounds per hour of sulfur dioxide (25 pounds per day), 5 pounds per hour of nitrogen oxides (25 pounds per day), 25 pounds per day of carbon monoxide, 5 pounds per hour of PM₁₀ (25 pounds per day), 3 pounds per hour of volatile organic compounds (15 pounds per day), including:
- (1) Sawdust handling and storage with maximum throughput capacity of 361 pounds of sawdust per hour. [326 IAC 6.5-1-2(a)]
 - (2) Truck loading with a maximum throughput capacity of 5,192 pounds of waste per hour. [326 IAC 6.5-1-2(a)]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant sawdust handling and loading operations shall not exceed 0.03 grain per dry standard cubic foot.

SECTION E.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ, this is an affected unit.

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

New Source Performance Standard Requirements:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

E.1.1 General Provision Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

E.1.2 Particulate Matter and Sulfur Dioxide [326 IAC 12] [40 CFR 60, Subpart Dc]

The 29.9 MMBtu per hour boiler, identified as unit EU-01C, is subject to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) (included as Attachment B of this permit), which are incorporated by reference as 326 IAC 12; however, there are no applicable emission limitations for this boiler, only record keeping requirements. Therefore, this source is subject to the following portions of NSPS, Subpart Dc:

- (1) 40 CFR 60.40c
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.48c(g)(1-3),(i),(j)

SECTION E.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ, this is an affected unit.

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

National Emission Standards for Hazardous Air Pollutants:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

E.2.1 General Provision Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJJJJJ.

E.2.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources [40 CFR 63, Subpart JJJJJJ]

The one (1) wood-fired boiler, identified as EU-01C is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (included as Attachment A of this permit).

Nonapplicable portions of the NESHAP will not be included in the permit. EU-01C is subject to the following portions of 40 CFR 63, Subpart JJJJJJ:

- (1) 40 CFR 63.11193
- (2) 40 CFR 63.11194(a),(b)
- (3) 40 CFR 63.11196(a)
- (4) 40 CFR 63.11200
- (5) 40 CFR 63.11201(a-d)
- (6) 40 CFR 63.11205(a)(c)
- (7) 40 CFR 63.11210(c)
- (8) 40 CFR 63.11214(b)(c)
- (9) 40 CFR 63.11223(a),(b)
- (10) 40 CFR 63.11225(a)(1,2),(b)(1-4)(c)(1-5)(d)
- (11) 40 CFR 63.11236
- (12) 40 CFR 63.11237
- (13) Table 2 (applicable portions)
- (14) Table 8 (applicable portions)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, Indiana 47106
Part 70 Permit No.: T019-31019-00079

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, Indiana 47106
Part 70 Permit No.: T019-31019-00079

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, Indiana 47106
Part 70 Permit No.: T019-31019-00079

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a Part 70 Significant Permit
Modification**

Source Description and Location

Source Name:	Koetter Woodworking, Inc.
Source Location:	533 Louis Smith Road, Borden, IN 47106
County:	Clark
SIC Code:	2499
Operation Permit No.:	T019-31019-00079
Operation Permit Issuance Date:	November 27, 2012
Significant Permit Modification No.:	019-34548-00079
Permit Reviewer:	Dominic Williams

Existing Approvals

The source was issued Part 70 Operating Permit No. T019-31019-00079 on November 27, 2012. There have been no subsequent approvals issued.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Koetter Woodworking, Inc. on May 19, 2014, relating to the removal of two wood-fired boilers and one emergency generator, and revision of the applicability of a condition to several baghouses. Each of the baghouses (DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC2) controlling the grinding and machining operations exhausts to the indoors. Therefore, visible emission notations cannot be performed for these baghouses. IDEM OAQ has removed the visible emission notation requirements for these baghouses and added pressure drop monitoring and recordkeeping requirements. The emission unit description for the grinding and machining operations has been revised to the following:

- (c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21, with each baghouse exhausting to the indoors. [326 IAC 6.5-1-2(a)]

The modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires significant changes in existing Part 70 monitoring permit terms and conditions. IDEM OAQ has removed the visible emission notation requirements for these baghouses and added pressure drop monitoring and recordkeeping requirements.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to this modification are as follows:

- (a) The baghouses (DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21) shall be in operation and control particulate emissions at all times when one or more of the associated grinding and machining operation is being performed.

The compliance monitoring requirements applicable to this modification are as follows:

- (b) The grinding and machining operations compliance monitoring requirements are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouses DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21	Water Pressure Drop	Weekly	1.0 to 4.0 inches	Response Steps

These monitoring conditions are necessary because the baghouses for the grinding and machining operation must operate properly to comply with 326 IAC 6.5-1-2(a) (Particulate Matter Limitations) and 40 CFR 64 (CAM).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T019-31019-00079. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Modification No. 1:

The source has requested the removal of baghouses DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21 from Condition D.4.4, since these units should not have been included in the condition because they do not exhaust to the atmosphere. These baghouses only exhaust to the indoors and visible emission notations can not be taken indoors.

Instead of visible emission notations, IDEM, OAQ has added baghouse pressure drop monitoring for baghouses DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21. The modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2 7 12(d), because the modification requires significant changes in existing Part 70 monitoring permit terms and conditions.

...
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- ...
- (c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21, **with each baghouse exhausting to the indoors.** [326 IAC 6.5-1-2(a)]
- ...

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(ec) Woodworking operations, identified as WW1, constructed in the 1960s and modified in 1996, with a maximum process rate of 31,047 pounds of wood per hour. Particulate matter emissions are controlled by ten (10) baghouses, identified as DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7.

(fd) Mill and saw-work, constructed in the 1960s, activities including:

...

Insignificant Activities

- (c) Grinding and machining operations controlled with fabric filters with a design outlet grain loading less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute including: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. Emissions of particulate matter are controlled using baghouses identified as DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21, **with each baghouse exhausting to the indoors.** [326 IAC 6.5-1-2(a)]
- ...

D.4.4 Visible Emissions Notations [40 CFR Part 64]

- (a) ~~Daily~~ Visible emission notations of the woodworking stack exhausts for baghouses DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, **and DC7** and the grinding operation stack exhausts for baghouses DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21 shall be performed **once per day** during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.
- ...

D.4.5 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall record the pressure drop across the baghouses (**DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7**) used in conjunction with the woodworking process operations WW1 at least once per week when the woodworking processes operations are in operation when venting to the atmosphere. ~~When for any one reading, the pressure drop across the baghouses are outside the normal range of (1) and (5) inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps.~~ **When for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for each of these baghouses is a pressure**

drop between 1 and 5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. A pressure reading that is outside this range is not a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps shall be considered a deviation from this permit.

- (b) **The Permittee shall record the pressure drop across the baghouses (DC11, DC12, DC13, DC14, DC15, DC17, DC18, DC19, and DC21) used in conjunction with the grinding and machining operation at least once per week when the grinding and machining operations are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for each of these baghouses is a pressure drop between 1 and 4 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside this range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.**
- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

...

D.4.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.45, the Permittee shall maintain records of daily visible emission notations of the ~~woodworking, grinding, and machining~~ **baghouse** stack exhausts associated with **the woodworking operations WW1**. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.4.56, the Permittee shall maintain weekly records of the pressure drop **across the baghouses used in conjunction with the woodworking operations WW1 and the machining and grinding operations at least once per week when these operations are in operation. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).**

...

Modification No. 2:

The source has requested the removal of the two wood-fired boilers EU-01A and EU-01B and the diesel-fired emergency generator.

...

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) ~~One (1) wood-fired boiler (identified as unit EU-01A), constructed in 1979, with a maximum heat input of 1.8 MMBtu per hour without control. Emissions are exhausted through stack S-1.~~

- ~~(b) One (1) wood/paper-fired boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without control. Emissions are exhausted through stack S-1.~~
- (ea) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2. Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ, this is an affected unit.
- (eb) One (1) vacuum coating system (identified as unit EU-02), constructed in 1996, with a maximum throughput rate of 12,000 linear feet of wood molding per hour, using a flow-coating application method.
- (ec) Woodworking operations (identified as WW1), constructed in the 1960s and modified in 1996, with a maximum process rate of 31,047 pounds of wood per hour. Particulate matter emissions are controlled by ten (10) baghouses (identified as DC1N, DC1S, DC2C, DC2N, DC2S, DC3, DC4, DC5, DC6, and DC7).
- (fd) Mill and saw-work activities, constructed in the 1960s, including:

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

...

- ~~(e) One (1) diesel-fired emergency generator, constructed in 1989, with a maximum heat input capacity of 5.7 MMBtu per hour. [40 CFR 63, Subpart ZZZZ][326 IAC 6-5-1-2(a)]~~

...

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- ~~(a) One (1) wood-fired boiler (identified as unit EU-01A), constructed in 1979, with a maximum heat input of 1.8 MMBtu per hour without controls. Emissions are exhausted through stack S-1.~~
- ~~(b) One (1) wood/paper-fired boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without controls. Emissions are exhausted through stack S-1.~~

Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ this is an affected unit.

Reserved.

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

~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

~~D.1.1 Particulate Matter Limitation [326 IAC 6-5-1-2(b)]~~

~~Pursuant to 326 IAC 6-5-1-2(b)(1)(C), the particulate matter emissions from the 1.8 MMBtu per hour boiler and the 2.5 MMBtu per hour boiler shall be limited to 0.6 pounds per million Btu.~~

~~D.1.2 Special Conditions to avoid NSPS 40 CFR 60, Subpart E, Cb and NESHAP 40 CFR 63, Subpart EEE~~

- ~~(a) The Permittee shall use only clean paper, including shredded currency, which is not contaminated with other types of waste as a supplemental fuel for the 2.5 MMBtu per hour boiler identified as EU-01B.~~

- ~~(b) The Permittee shall use only the following material as solid fuel for the boilers identified as EU-01A and EU-01B:~~

~~Clean wood, which includes only uncoated, unpainted and untreated: wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials.~~

~~Compliance with this limit ensures that the boilers at which the wood material is burned do not meet the definition of Municipal waste combustor under NSPS, Subpart Cb. Therefore, NSPS, Subpart Cb does not apply to the boilers.~~

~~Compliance with this limit ensures that the wood material burned at the boilers does not meet the definition of solid waste under NSPS, Subpart E. Therefore, NSPS, Subpart E does not apply to the boilers.~~

~~Compliance with this limit ensures that the boilers at which the wood material is burned do not meet the definition of Hazardous waste solid fuel boiler under NESHAP, Subpart EEE. Therefore, NESHAP, Subpart EEE does not apply to the boilers.~~

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan is required for these facilities and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.1.4 Visible Emissions Notations~~

- ~~(a) Visible emission notations of the boiler stack exhausts 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.1.5 Record Keeping Requirements~~

- ~~(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts once per day. 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 contains the Permittee's obligations with regard to the records required by this condition.~~

...

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(ea) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ this is an affected unit.

...

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(db) One (1) vacuum coating system (identified as unit EU-02), constructed in 1996, with a maximum throughput rate of 12,000 linear feet of wood molding per hour, using a flow-coating application method.

...

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

(b) Propane or liquid petroleum gas, or butane-fired combustion units with heat input of equal to or less than six million (6,000,000) Btu per hour [326 IAC 6.5-1-2(b)], including:

- (1) One (1) propane boiler, with a maximum heat input capacity of 2 MMBtu per hour.
- (2) One (1) propane oven, with a maximum heat input capacity of 0.66 MMBtu per hour.

~~(e) One (1) emergency generator with a maximum heat input capacity of 5.7 MMBtu per hour. [326 IAC 6.5-1-2(a)].~~

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

- ~~(a) Pursuant to 326 IAC 6.5-1-2(b), the particulate matter emissions from the propane-fired boilers **and oven** shall be limited to 0.15 pounds per million Btu.~~
 - ~~(b) Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the emergency generator shall be limited to 0.03 grain per dry standard cubic foot.~~
- ...

SECTION E.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) ~~One (1) wood-fired boiler (identified as unit EU-01A), constructed in 1979, with a maximum heat input of 1.8 MMBtu per hour without controls. Emissions are exhausted through stack S-1.~~

(b) ~~One (1) wood/paper-fired boiler (identified as unit EU-01B), constructed in 1982, with a maximum heat input of 2.5 MMBtu per hour without controls. Emissions are exhausted through stack S-1.~~

(ea) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.

Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ, this is an affected unit.

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

...

E.2.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, ~~[326 IAC 20-1]~~ [40 CFR 63, Subpart JJJJJJ]

The ~~three (3)~~**one (1)** wood-fired boilers, identified as ~~EU-01A, EU-01B, and EU-01C~~ **are** subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ **(included as Attachment A of this permit).**

Nonapplicable portions of the NESHP will not be included in the permit. ~~EU-01A, EU-01B, and EU-01C,~~ **are** each subject to the following portions of 40 CFR 63, Subpart JJJJJJ:

...

SECTION E.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) ~~One (1) diesel-fired emergency generator with a maximum heat input capacity of 5.7 MMBtu per hour.~~

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

National Emission Standards for Hazardous Air Pollutants (NESHP) Requirements [326 IAC 2-7-5(1)]

E.3.1 ~~General Provisions Relating to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [326 IAC 20-1] [40 CFR Part 63, Subpart A]~~

Pursuant to 40 CFR 63, Subpart ZZZZ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, except as otherwise specified in 40 CFR 63, Subpart ZZZZ.

E.3.2 ~~National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [326 IAC 20-82] [40 CFR Part 63, Subpart ZZZZ]~~

Pursuant to 40 CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the provisions of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (included as Attachment B of this permit), which are incorporated by reference as 326 IAC 20-82, as specified as follows:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585 (a), (b)
- (3) 40 CFR 63.6590 (a)(1)(ii), (a)(1)(iv), (a)(2)(ii)
- (4) 40 CFR 63.6595 (a)(1), (e)
- (5) 40 CFR 63.6602 (a)
- (6) 40 CFR 63.6605
- (7) 40 CFR 63.6625 (e)(2), (f), (h), and (i)
- (8) 40 CFR 63.6640 (a), (b), (f)(1)(i-iii)
- (9) 40 CFR 63.6655 (a), (e), (f)
- (10) 40 CFR 63.6660
- (11) 40 CFR 63.6665
- (12) 40 CFR 63.6670
- (13) 40 CFR 63.6675
- (14) ~~Table 2d to Subpart ZZZZ of Part 63 - Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions~~
- (15) ~~Table 6 to Subpart ZZZZ of Part 63 - Continuous Compliance with Emission Limitations, Work Practices, and Management Practices~~
- (16) ~~Table 8 to Subpart ZZZZ of Part 63 - Applicability of General Provisions to Subpart ZZZZ~~

...

Additional Changes

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (a) IDEM, OAQ has updated the emission unit descriptions for the wood-fired boiler (EU-01C) throughout the permit so that the descriptions are consistent throughout the permit.
- (b) On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition.
- (c) IDEM, OAQ has clarified Section B - Permit Renewal.
- (d) IDEM, OAQ has clarified Section B - Operational Flexibility.
- (e) IDEM, OAQ is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (f) IDEM, OAQ has revised Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (g) IDEM, OAQ has clarified the 326 IAC 6.5-1-2 language under Conditions D.2.1, D.4.1, D.6.1, and D.7.1.
- (h) IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.
- (i) IDEM, OAQ has corrected condition references in Conditions D.2.7 and D.4.7.
- (j) IDEM, OAQ has revised Condition D.4.5 to include the replacement of an instrument as an acceptable action.
- (k) IDEM, OAQ has revised Condition D.4.7(b) to clarify the recordkeeping requirements.
- (l) IDEM, OAQ has revised Conditions E.1.2 and E.2.2 to specify the associated state rule and attachment.

- (m) IDEM, OAQ has revised FESOP Quarterly Deviation And Compliance Monitoring Report Form to be consistent with Section C - General Reporting Requirements.
- (n) IDEM has corrected an error on page 1 of the emission calculation summary table in Appendix A of the TSD. In summary table, the limited potential to emit values for the woodworking operation WW1 were corrected from the lbs/hour values to the tons/year values (see Appendix A of the TSD for updated calculations). The emission calculations for the woodworking operation WW1 were not revised as a result of this correction. This correction did not result in the source being subject to any new state or federal rules. The woodworking operation was already and will continue to be subject to 326 IAC 6.5 and CAM. This correction did not result in a change to the permit.

The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

...

A.2 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (ea) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2. Under 40 CFR 60, Subpart Dc, **and 40 CFR 63, Subpart JJJJJJ**, this is an affected unit.

...

...

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(~~3435~~), and

...

- (c) A "responsible official" is defined at 326 IAC 2-7-1(~~3435~~).

...

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

...

- (c) The annual compliance certification report shall include the following:

...

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~3435~~).

...

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

...

- (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:

...

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

B.11 Emergency Provisions [326 IAC 2-7-16]

...

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

...

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

...

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(4042). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

...

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(~~3637~~)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

...

(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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management

Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

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

...

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

C.8 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) **For new units:**
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.
- (b) **For existing units:**
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance ~~or of initial start-up, whichever is later~~, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance ~~or the date of initial startup, whichever is later~~, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

...

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

~~Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.~~

- (bc) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (ed) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner

or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

...

C.9 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (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. **The analog instrument shall be capable of measuring values outside of the normal range.**

...

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

...

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

...

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

D.2.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

Pursuant to 326 IAC 6.5-1-2(b)(1)(B), the particulate matter emissions from the 29.9 MMBtu per hour boiler shall be limited to **not exceed** 0.35 pounds per million Btu.

...

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(1312)]

...

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.54, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per day. 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).

...

D.4.1 Particulate Matter Limitation [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the woodworking operations identified as WW1 and the insignificant grinding and machining operations shall ~~be limited to~~ **not exceed** 0.03 grain per dry standard cubic foot.

...

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(1213)]

...

D.4.5 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process WW1 at least once per week when the woodworking processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across any baghouse is outside the normal range of one (1) to five (5) inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside this range is not a deviation from this permit. 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.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

...

D.6.1 Particulate Matter Limitation [326 IAC 6.5-1-2(b)]

- (a) Pursuant to 326 IAC 6.5-1-2(b), the particulate matter emissions from the propane-fired boilers shall ~~be limited to~~ **not exceed** 0.15 pounds per million Btu.

...

D.7.1 Particulate Matter [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant sawdust handling and loading operations shall ~~be limited to~~ **not exceed** 0.03 grain per dry standard cubic foot.

...

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(ea) One (1) wood-fired boiler (identified as unit EU-01C), constructed in 1996, with a maximum heat input rating of 29.9 MMBtu per hour. Emissions of particulate matter are controlled by a single cyclone, which exhausts at stack S-2.
Under 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ, this is an affected facility unit.
...

...

E.1.2 Particulate Matter and Sulfur Dioxide [326 IAC 12-4] [40 CFR 60, Subpart Dc]

The 29.9 MMBtu per hour boiler, identified as unit EU-01C, is subject to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) **(included as Attachment B of this permit), which are incorporated by reference as 326 IAC 12;** however, there are no applicable emission limitations for this boiler, only record keeping requirements. Therefore, this source is subject to the following portions of NSPS, Subpart Dc:

...

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

...

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting.** Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

...

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 019-34548-00079. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Dominic Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams**

UNLIMITED POTENTIAL TO EMIT IN TONS PER YEAR

Process/Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG	Total HAPs	Highest Single HAP
Woodworking	126,967	126,967	126,967	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
Insignificant Woodworking	15.4	15.4	15.4	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
Wood boilers	52.4	47.1	40.6	3.3	64.2	2.2	78.6	15,809	1.6	2.5 Hydrogen Chloride
Surface Coating	0.0	0.0	0.0	0.0	0.0	21.7	0.0	0	0.0	0.0 ---
Insignificant Combustion	0.1	0.1	0.1	0.2	2.4	0.1	0.4	1,573	0.0	0.0 ---
Saw and Millwork	20.8	12.1	12.1	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
Grinding	450.5	450.5	450.5	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
TOTAL	127,506	127,492	127,486	3.5	66.5	24.0	79.0	17,382	1.6	2.5 Hydrogen Chloride

LIMITED POTENTIAL TO EMIT IN TONS PER YEAR

Process/Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG	Total HAPs	Highest Single HAP
Woodworking	127.0	127.0	127.0	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
Insignificant Woodworking	15.4	15.4	15.4	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
Wood boilers	52.4	47.1	40.6	3.3	64.2	2.2	78.6	15,809	1.6	2.5 Hydrogen Chloride
Surface Coating	0.0	0.0	0.0	0.0	0.0	21.7	0.0	0	0.0	0.0 ---
Insignificant Combustion	0.1	0.1	0.1	0.2	2.4	0.1	0.4	1,573	0.0	0.0 ---
Saw and Millwork	20.8	12.1	12.1	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
Grinding	4.5	4.5	4.5	0.0	0.0	0.0	0.0	0	0.0	0.0 ---
TOTAL	220.2	206.2	199.7	3.5	66.5	24.0	79.0	17,382	1.6	2.5 Hydrogen Chloride

**Appendix A: Emissions Calculations
Woodworking Operations (WW1)**

Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams

Baghouse ID	Air Flow Rate (acfm)	Throughput (lbs/hr)	Outlet Grain Loading (gr/acf)	PTE After Control (tons/yr)	Control Efficiency (%)	PTE Before Control (tons/yr)	PM Emissions after control (lbs/hr)
DC1N	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC1S	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC2C	8,500	1,460	0.02	6.38	99.9%	6,382	1.46
DC2N	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC2S	8,500	1,460	0.02	6.38	99.9%	6,382	1.46
DC3	6,000	1,030	0.02	4.51	99.9%	4,505	1.03
DC4	4,096	700	0.02	3.08	99.9%	3,076	0.70
DC5	17,000	2,914	0.02	12.8	99.9%	12,765	2.91
DC6	64,000	10,971	0.02	48.1	99.9%	48,055	11.0
DC7	10,000	1,710	0.02	7.51	99.9%	7,509	1.71
Totals		28,987		127		126,967	29.0

Methodology:

PTE After Controls (tons/yr) = Air Flow (acfm) x outlet grain loading (gr/acf) x (1lb/7000 gr) x 60 min/hr x 8760 hrs/yr x (1 ton/2000lb)

PTE Before Controls (tons/yr) = PTE after controls (tons/yr) / (1 - control efficiency)

**Appendix A: Emissions Calculations
Insignificant Woodworking Operations**

Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams

Baghouse ID	Air Flow Rate (acfm)	Throughput (lbs/hr)	Outlet Grain Loading (gr/acf)	PTE After Control (tons/yr)	Control Efficiency (%)	PTE Before Control (tons/yr)	PM Emissions after control (lbs/hr)
DC11	1,500	62.5	0.02	1.13	99.9%	1,126	0.26
DC12	3,000	625	0.02	2.25	99.9%	2,253	0.51
DC13	3,000	3,125	0.02	2.25	99.9%	2,253	0.51
DC14	3,000	3,125	0.02	2.25	99.9%	2,253	0.51
DC15	1,500	2,500	0.02	1.13	99.9%	1,126	0.26
DC17	3,000	500	0.02	2.25	99.9%	2,253	0.51
DC18	3,000	750	0.02	2.25	99.9%	2,253	0.51
DC19	1,500	375	0.02	1.13	99.9%	1,126	0.26
DC21	1,000	3.13	0.02	0.75	99.9%	751	0.17
Totals		11,066		15.4		15,393	3.51

Methodology:

PTE After Controls (tons/yr) = Air Flow (acfm) x outlet grain loading (gr/acf) x (1lb/7000 gr) x 60 min/hr x 8760 hrs/yr x (1 ton/2000lb)

PTE Before Controls (tons/yr) = PTE after controls (tons/yr) / (1 - control efficiency)

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

**Company Name: Koetter Woodworking, Inc.
 Source Address: 533 Louis Smith Road, Borden, IN 47106
 Part 70 Permit No.: T019-31019-00079
 Significant Permit Modification No.: 019-34548-00079
 Reviewer: Dominic Williams**

Emission Units: EU-01C

Total Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
29.9	1000	261.9

Greenhouse Gas			
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	15,715	0.3	0.3
Summed Potential Emissions in tons/yr	15,716		
CO2e Total in tons/yr	15,809		

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations
Wood-fired Boilers**

**Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams**

Emission Unit	Total Heat Input Capacity MMBtu/hr
EU-01C	29.9

	Pollutant							Hazardous Air Pollutants (HAPs)					
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Manganese	Total HAP
Emission Factor in lb/MMBtu	0.4	0.36	0.31	0.025	0.49	0.017	0.6	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.6E-03	
Potential Emission in tons/yr	52.4	47.1	40.6	3.3	64.2	2.2	78.6	0.55	0.58	2.49	0.25	0.21	1.58

Methodology

Emission Factors from AP-42, Chapter 1.6 (Wood Residue Combustion in Boilers), Tables 1.6-1, 1.6-2, and 1.6-3 (9/03)
Emission (tons/yr) = Heat input (MMBtu/hr) x 8760 hrs/yr x Emission Factor (lb/MMBtu)/2,000 lb/ton

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams**

	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Material	13.7	31.70%	30.7%	1.0%	50.7%	47.78%	0.003	12000	0.28	0.14	4.95	119	21.7	0.0	0.29	100%
W/B Primer																
Totals											4.95	119	21.7	0.0		

*Surface Coating operation uses a dip and drain method with 100% transfer efficiency.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Insignificant Combustion Sources Using Propane
(Includes the 2 MMBtu/hr Propane Boiler and the 0.66 MMBtu/hr Drying Oven)

Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Sulfur content ***= 15.00 grains/100ft ³
2.66	247.89	

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NO _x	VOC	CO
	0.6	0.6	0.6	1.500 (0.10 S)	19.0	0.5 **TOC value	3.2
Potential Emission in tons/yr	0.07	0.07	0.07	0.186	2.35	0.06	0.40

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-
**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.
***Sulfur Content of Commercial Propane based on Gas Processors Association Engineering Data Book (Ninth Edition).

Methodology

1 gallon of LPG has a heating value of 94,000 Btu (Source - AP-42 (Supplement B 10/96) page 1.5-1)
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu
Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Emission Factor in lb/kgal	Greenhouse Gas		
	CO2	CH4	N2O
	12,500	0.2	0.9
Potential Emission in tons/yr	1,549	0.0	0.1
Summed Potential Emissions in tons/yr	1,549		
CO2e Total in tons/yr	1,573		

Methodology

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.
Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
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 (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emission Calculations
Saw and Millwork Operations**

**Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams**

Operation	Throughput (lbs/hour)	Pollutant	Emission Factors (lbs/ton)	PTE (lbs/hr)	PM PTE (tons/yr)	Reference for Emission Factor
Lumber Processing	17,308	PM	0.35	3.03	13.3	Fire 6.22, SCC 30700802
	17,308	PM-10	0.20	1.73	7.58	Fire 6.22, SCC 30700802
Waste Handling	1,731	PM	2.00	1.73	7.58	Fire 6.22, SCC 30703002
	1,731	PM-10	1.20	1.04	4.55	Fire 6.22, SCC 30703002
Total PM				4.76	20.85	
Total PM-10				2.77	12.13	

Methodology

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

PTE (tons/yr) = PTE (lbs/hr) x 8760 hrs/yr x 1ton/2000 lbs

**Appendix A: Emissions Calculations
Grinding/Machining**

**Company Name: Koetter Woodworking, Inc.
Source Address: 533 Louis Smith Road, Borden, IN 47106
Part 70 Permit No.: T019-31019-00079
Significant Permit Modification No.: 019-34548-00079
Reviewer: Dominic Williams**

PM/PM₁₀/PM_{2.5} Emissions

Operation	Air Flow Rate (acfm)	Outlet Grain Loading (gr/ascf)	Baghouse Control Efficiency (%)	PM/PM ₁₀ /PM _{2.5} Controlled Emissions (lbs/hour)	PM/PM ₁₀ /PM _{2.5} Uncontrolled Emissions (tons/yr)	PM/PM ₁₀ /PM _{2.5} Controlled Emissions (tons/yr)
Grinding/machining	4,000	0.03	99.00%	1.03	450.51	4.51
Total					450.51	4.51

Methodology

tons/yr annual controlled emissions = (gr/ascf) x (acfm) x (60 min/hr) / (7000 gr/lb) = lbs/hr
 (lbs/hr) x (8760 hr/yr) / (ton/2000 lbs)

tons/yr annual uncontrolled emissions = (lbs/hr) / (1-0.85) = lbs/hr
 (lbs/hr) x (8760 hrs/hr) / (tons/2000 lbs)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Kory Byrne
Koetter Woodworking, Inc.
533 Louis Smith Road
Borden, IN 47106

DATE: October 7, 2014

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

SUBJECT: Final Decision
Significant Permit Modification
019-34548-00079

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:
Gerald Koetter – Vice President
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 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

October 7, 2014

TO: Clark County Public Library – Borden Branch

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

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


Applicant Name: Koetter Woodworking, Inc.
Permit Number: 019-34548-00079

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 10/7/2014 Koetter Woodworking, Inc 019-34548-00079 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Kory Byrne Koetter Woodworking, Inc 533 Louis Smith Road Borden IN 47106 (Source CAATS) via confirmed delivery										
2		Gerald Koetter Vice President Koetter Woodworking, Inc 533 Louis Smith Road Borden IN 47106 (RO CAATS)										
3		Clark County Public Library - Borden Branch 117 Main St Borden IN 47106 (Library)										
4		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
5		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
6		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
7		Borden Town Council and Town Manager P.O. Box 125 Borden IN 47106 (Local Official)										
8		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
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