



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Significant Revision to a  
Federally Enforceable State Operating Permit (FESOP)

for Rockland Wood Products, LLC in White County

Significant Permit Revision No.: 181-35715-00041

The Indiana Department of Environmental Management (IDEM) has received an application from Rockland Wood Products, LLC, located at 8089 N 200 W, Monon, IN 47959, for a significant revision of its FESOP issued on May 13, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Rockland Wood Products, LLC to make certain changes at its existing source. Rockland Wood Products, LLC has applied to utilize a new coating. The source also requested that the current limits for the wood undercoating booth (5-013) in Section D.1 be revised to allow greater operational flexibility in coating usage.

A copy of the permit application and IDEM's preliminary findings are available at:

Monon Town & Township Public Library  
427 N. Market St., PO Box 305  
Monon, IN 47959

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

#### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 181-35715-00041 in all correspondence.



**Comments should be sent to:**

Adam Wheat  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-8397  
Or dial directly: (317) 233-8397  
Fax: (317) 232-6749 attn: Adam Wheat  
E-mail: [awheat@idem.IN.gov](mailto:awheat@idem.IN.gov)

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Adam Wheat or my staff at the above address.



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



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Commissioner

## DRAFT

Matthew Clark  
Rockland Wood Products, LLC  
8089 N 200 W  
Monon, IN 47959

Re: 181-35715-00041  
Significant Revision to  
F181-26795-00041

Dear Mr. Clark:

Rockland Wood Products, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F181-26795-00041 on May 13, 2009 for a stationary laminate floor manufacturing facility located at 8089 N 200 W, Monon, IN 47959. On April 15, 2015, the Office of Air Quality (OAQ) received an application from the source requesting a modification of the wood undercoating booth (5-013) to utilize a new coating. The source also requested that the current limits for the wood undercoating booth (5-013) in Section D.1 be revised to allow greater operational flexibility in coating usage. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. 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 revision:

Attachment A: 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Attachment B: 40 CFR 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

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](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>.

## **DRAFT**

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 Adam Wheat of my staff at 317-233-8397 or 1-800-451-6027, and ask for extension 3-8397.

Sincerely,

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

Attachments: Technical Support Document and revised permit

NB/aw

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



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## Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Rockland Wood Products, LLC  
8089 North 200 West  
Monon, Indiana 47969**

(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. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F181-26795-00041	
Issued by: <i>Original Signed by:</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 13, 2009  Expiration Date: May 13, 2019

Significant Permit Revision No.: 181-33844-00041, issued on April 15, 2014.

Significant Permit Revision No.: 181-35715-00041	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: May 13, 2019

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 2-8-3(b)]

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The Permittee owns and operates a stationary laminate flooring manufacturing operation.

Source Address:	8089 North 200 West, Monon, Indiana 47969
General Source Phone Number:	(215) 253-8506
SIC Code:	2426
County Location:	White
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 2-8-3(c)(3)]

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

- (a) Woodworking shop, identified as 5-003, with a maximum throughput rate of 3082 board feet of raw wood per hour to produce truck floors, equipped with two (2) integral baghouses, identified as 5-003a and 5-003b, constructed in 1983, exhausting outside.
- (b) One (1) wood gluing operation, using four rubber rollers acting as one unit to apply the glue, identified as 5-012, with a maximum throughput rate of 150 pounds of resin per hour, installed in 1995.
- (c) One (1) wood undercoating booth, identified as 5-013, with four (4) spray guns and one (1) backup gun, with a maximum throughput rate of 24.0 gallons of coating per hour, per gun, using dry filters as control, constructed in 1995, approved in 2014 for modification.
- (d) One (1) 30.9 million BTU per hour wood-fired boiler, identified as 5-001, exhausting at Stack 5-001a, installed in 1975.

This boiler is an affected unit under the provisions of 40 CFR 63, Subpart JJJJJJ

- (e) One (1) 29.03 million BTU per hour wood-fired dutch oven boiler, identified as 5-002, using a multi-cyclone collector as control, installed in 1995, exhausting at Stack 5-002a.

This boiler is an affected unit under the provisions of 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities:

- (a) One (1) wood chip storage silo. Emissions are controlled by a cyclone at the silo inlet during loading and by a baghouse at the silo outlet during loadout.

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- (b) One (1) cold cleaner degreaser without a remote solvent reservoir, installed in 1983. Usage does not exceed 145 gallons per twelve (12) months. [326 IAC 8-3,8-8]
- (c) Five (5) natural gas-fired combustion units with heat input capacity of 0.4 MMBtu per hour, each.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Cleaners and solvents characterized as follows:
  - (A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;
  - (B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured as 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (i) Closed loop heating and cooling systems.
- (j) Infrared cure equipment.
- (k) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (l) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (n) Blowdown for any of the following: sight glass, boiler, compressors, and cooling tower.

#### A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

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## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F181-26795-00041, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-8-6] [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 2-8-4(4)]

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 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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.

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**B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]**

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(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Emergency Provisions [326 IAC 2-8-12]**

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- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly

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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 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

- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

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- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) 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.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

- (a) All terms and conditions of permits established prior to F181-26795-00041 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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 2-8-3(h) and 326 IAC 2-8-9.

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**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
**[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least 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



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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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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

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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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
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 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

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## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

**C.2 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

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Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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).

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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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

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- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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## Compliance Requirements [326 IAC 2-1.1-11]

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

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

## Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

### C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (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.

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**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.



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The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (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 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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- (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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

#### **Stratospheric Ozone Protection**

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

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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.

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## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Woodworking shop, identified as 5-003, with a maximum throughput rate of 3082 board feet of raw wood per hour to produce truck floors, using two baghouses for particulate control, identified as 5-003a and 5-003b, as controls, constructed in 1983, exhausting outside.
- (b) One (1) wood gluing operation, using four rubber rollers acting as one unit to apply the glue, identified as 5-012, with a maximum throughput rate of 150 pounds of resin per hour, installed in 1995.
- (c) One (1) wood undercoating booth, identified as 5-013, with four (4) spray guns and one (1) backup gun, with a maximum throughput rate of 24.0 gallons of coating per hour, per gun, using dry filters as control, constructed in 1995, approved in 2014 for modification.

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate Matter [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking shop (5-003) shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,637 pounds per hour.

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

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

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

- (b) Pursuant to 326 IAC 6-3-2(d), particulate from the wood undercoating booth (5-013) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.2 Particulate Matter PSD Minor Limitation (PM) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The PM emissions from the woodworking shop (5-003) shall not exceed 4.54 pounds per hour.
- (b) The PM emissions from by the wood undercoating booth (5-013) shall not exceed 8.59 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (c) The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.

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- (d) The density of any paint applied in the wood undercoating booth (5-013) shall not exceed 10.50 pounds per gallon of coating.
- (e) The solids content of any paint applied in the wood undercoating booth (5-013) shall not exceed 55.0% by weight solids.
- (f) The transfer efficiency (%) of the spray applicators in the wood undercoating booth (5-013) shall be equal to or greater than 65% at all times.
- (g) The control efficiency (%) of the dry filters in the wood undercoating booth (5-013) shall be equal to or greater than 95% at all times.

Compliance with these limits, in conjunction with the PM PTE from other emission units at this source, shall limit the source-wide PM emissions to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.3 PM10 and PM2.5 [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), and order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) The PM10 and PM2.5 emissions from the woodshop (5-003) shall not exceed 4.54 pounds per hour, each.
- (b) The PM10 and PM2.5 emissions from the wood undercoating booth (5-013) shall each not exceed 8.59 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (c) The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.
- (d) The density of any paint applied in the wood undercoating booth (5-013) shall not exceed 10.50 pounds per gallon of coating.
- (e) The solids content of any paint applied in the wood undercoating booth (5-013) shall not exceed 55.0% by weight solids.
- (f) The transfer efficiency (%) of the spray applicators in the wood undercoating booth (5-013) shall be equal to or greater than 65% at all times.
- (g) The control efficiency (%) of the dry filters in the wood undercoating booth (5-013) shall be equal to or greater than 95% at all times.

Compliance with these limits, in conjunction with the PM10 and PM2.5 PTE from other emission units at this source, shall limit the source-wide PM10 emissions and PM2.5 emissions to less than 100 tons per twelve (12) consecutive month period, respectively, and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-1-6]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable, the Permittee shall comply with the following:

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- (a) The VOC input to the wood undercoating booth (5-013) shall be less than 24.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.
- (c) The VOC content of any paint applied in the wood undercoating booth (5-013) shall not exceed 0.29 lb VOC per gallon of coating.

Compliance with the above limits, combined with the PTE VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance with the above limits shall limit the VOC from the wood undercoating booth (5-013) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

#### D.1.5 Hazardous Air Pollutants [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable, the Permittee shall comply with the following:

- (a) The input of any combination of HAPs to wood undercoating booth (5-013) shall be less than 6.38 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.
- (c) The HAP content of any paint applied in the wood undercoating booth (5-013) shall not exceed 0.075 lb VOC per gallon of coating.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### **Compliance Determination Requirements**

#### D.1.7 Compliance Determination (PM/PM10)

In order to ensure compliance with Conditions D.1.1, D.1.2, and D.1.3, particulate from the wood undercoating booth (5-013) shall be controlled by a dry particulate filter, and the Permittee shall

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operate the filter in accordance with the manufacturer's specifications, and the two (2) baghouses (5-003a and 5-003b) for PM10 and PM2.5 control shall be in operation and control emissions from the Woodworking shop (5-003) facility at all times the Woodworking shop facility is in operation.

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 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.1.8 Visible Emissions Notations**

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- (a) Visible emission notations of the baghouses, 5-003a and 5-003b, stack exhaust used in conjunction with the woodworking shop 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.
- (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 a reasonable response. Section C – Response to Excursions and 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.1.9 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse 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 has 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).

Bag failure can be indicated by a significant drop in the baghouse 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.

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#### D.1.10 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the wood undercoating booth (5-013) filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the under coating booth stack while the under coating booth is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the wood undercoating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Failure to take a response shall be considered a deviation from this permit.

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### D.1.11 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse shop stack exhaust. 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 Conditions D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) To document the compliance status with Conditions D.1.2(c), (d), (e), (f), and (g), D.1.3(c), (d), (e), (f), and (g), D.1.4(b) and (c), and D.1.5(b) and (c) the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to demonstrate compliance with the PM/PM10/PM2.5/VOC/HAP emission limits established in Conditions D.1.2(c), (d), (e), (f), and (g), D.1.3(c), (d), (e), (f), and (g), and D.1.4(b) and (c), and D.1.5(b) and (c)
  - (1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The density and weight percent solids of each coating material used (as applied).
  - (3) The pounds/gallon of VOC of each coating material used (as applied).
  - (4) The pounds/gallon of HAP of each coating material used (as applied).
  - (5) The transfer efficiency (TE) of the spray guns in booth 5-013.
  - (6) The control efficiency (CE) of the dry filters on booth 5-013.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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#### D.1.12 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Conditions D.1.2(c), D.1.3(c), D.1.4(b), and D.1.5(b), shall be submitted using the reporting form located at the end of this permit, or its equivalent not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).



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## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-8-4(10)]:

- (e) One (1) 30.9 million Btu per hour wood-fired boiler, identified as 5-001, installed in 1975, exhausting at Stack 5-001a.
- (f) One (1) 29.03 million Btu per hour wood-fired dutch oven boiler, identified as 5-002, using a multi-cyclone collector as control, installed in 1995, and exhausting at Stack 5-002a.

The wood-fired dutch oven boiler, unit 5-002, is subject to NSPS Subpart Dc.

(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 2-8-4(1)]

#### D.2.1 PM, PM10, PM2.5, NOx, CO FESOP and PSD Minor Limitation [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The amount of wood burned in the two (2) wood-fired boilers (5-001 and 5-002) shall not exceed a combined total of 20,600 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM emissions rate from the two (2) wood-fired boilers, 5-001 and 5-002, shall not exceed 6.4 pounds per ton of wood.
- (c) The PM10 emissions rate from the two (2) wood-fired boilers, 5-001 and 5-002, shall not exceed 6.03 pounds per ton of wood.
- (d) The PM 2.5 emission rate from the two (2) wood-fired boilers, 5-001 and 5-002, shall not exceed 5.23 pounds per ton of wood.
- (d) The NOx emissions rate from the two (2) wood-fired boilers, 5-001 and 5-002, shall not exceed 7.84 pounds per ton of wood.
- (e) The CO emissions rate from the two (2) wood-fired boilers, 5-001 and 5-002, shall not exceed 9.6 pounds per ton of wood.

Compliance with these limitations, in conjunction with the PTE of PM10, PM2.5, NOx, and CO from other emission units at this source, shall limit the source-wide total PTE of PM10, PM2.5, CO and NOx to less than 100 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-7 (Part 70) not applicable.

Compliance with these limitations, in conjunction with the PTE of PM, PM10, and PM2.5 from the other emissions units at this source, shall limit the source-wide total PTE of PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.2.2 Particulate [326 IAC 6-2-3] [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the PM emissions from all facilities use for indirect heating purposes which were existing and in operation after June 8, 1972, shall not exceed 0.6 pounds of particulate matter per million

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British thermal units heat input. Therefore, the wood fired boiler (5-001) shall not exceed 0.6 pounds of particulate matter per MMBtu heat input.

- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the wood fired boiler (5-002) which was existing and in operation after September 21, 1983, shall not exceed 0.38 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where  $P_t$  = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
 $Q$  = Total source maximum operating capacity rating in million Btu per hour heat input (59.0 MMBtu per hour)

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and any 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 Control

In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the cyclone for particulate control shall be in operation and control emissions from the wood-fired boilers at all times the boilers are in operation.

#### D.2.5 Wood-Fired Boiler Operation

When burning wood in the two (2) wood-fired boilers (5-001 and 5-002) the Permittee shall comply with the following:

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

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.6 Visible Emissions Notations

- (a) Visible emission notations of cyclone 5-002a stack exhaust 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.

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- (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 a reasonable response. Section C – Response to Excursions and 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.2.7 Cyclone Failure Detection

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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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.8 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of visible emission notations of the two (2) wood fired boilers stack exhausts (5-001 and 5-002). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a 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.

#### D.2.9 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Condition D.2.1(a) shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) cold cleaner degreaser without a remote solvent reservoir, installed in 1983. Usage does not exceed 145 gallons per twelve (12) months. [326 IAC 8-3,8-8]

(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 2-8-4(1)]

#### D.3.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:

Ensure the following control equipment and operating requirements are met:

- (a) Equip the degreaser with a cover.
- (b) Equip the degreaser with a device for draining cleaned parts.
- (c) Close the degreaser cover whenever parts are not being handled in the degreaser.
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
- (f) Store waste solvent only in closed containers.
- (g) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (h) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
  - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (2) A water cover when solvent used is insoluble in, and heavier than, water.
  - (3) A refrigerated chiller.
  - (4) Carbon adsorption.
  - (5) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

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- (i) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (j) If used, solvent spray:
  - (1) must be a solid, fluid stream; and
  - (2) shall be applied at a pressure that does not cause excessive splashing.

**D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]**

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Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**D.3.3 Record Keeping Requirements**

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- (a) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

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## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (c) One (1) 29.03 million Btu per hour wood-fired dutch oven boiler, identified as 5-002, using a multi-cyclone collector as control, installed in 1995, and exhausting at Stack 5-002a.

This boiler is an affected unit under the provisions of 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ.

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

### New Source Performance Standards (NSPS) Requirements [40 CFR 60, Subpart Dc]

#### E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the above listed emissions units, except as otherwise specified in 40 CFR Part 60, Subpart Dc.

- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

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

#### E.1.2 New Source Performance Standards Of Performance for Small Industrial -Commercial-Institutional Steam Generating Units [326 IAC 12] [40 CFR 60, Subpart Dc]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart Dc (included as Attachment A to this permit), which are incorporated by reference as 326 IAC 12, for the above listed emissions units as specified as follows.

- (a) 40 CFR 60.40c(a),(b),(c), and (d)  
(b) 40 CFR 60.41c  
(c) 40 CFR 60.48c(g), and (i)

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## SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (d) One (1) 30.9 million BTU per hour wood-fired boiler, identified as 5-001, exhausting at Stack 5-001a, installed in 1975.

This boiler is an affected unit under the provisions of 40 CFR 63, Subpart JJJJJJ

- (e) One (1) 29.03 million BTU per hour wood-fired dutch oven boiler, identified as 5-002, using a multi-cyclone collector as control, installed in 1995, exhausting at Stack 5-002a.

This boiler is an affected unit under the provisions of 40 CFR 60, Subpart Dc, and 40 CFR 63, Subpart JJJJJJ.

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

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

#### E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11235, 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, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart JJJJJJ, in accordance with the schedule in 40 CFR Part 63, Subpart JJJJJJ.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

Pursuant to 40 CFR Part 63, Subpart JJJJJJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJJJJJ, (included as Attachment B to this permit), for the above listed emissions units, as specified as follows.

- (a) 40 CFR 63.11193
- (b) 40 CFR 63.11194(a)(1), (b)
- (c) 40 CFR 63.11196(a)
- (d) 40 CFR 63.11200(b)
- (e) 40 CFR 63.11201
- (f) 40 CFR 63.11205(a)

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- (g) 40 CFR 63.11210(c)
- (h) 40 CFR 63.11214(b)
- (i) 40 CFR 63.11223(a), (b)
- (j) 40 CFR 63.11225
- (k) 40 CFR 63.11226
- (l) 40 CFR 63.11235
- (m) 40 CFR 63.11236
- (n) 40 CFR 63.11237
- (o) Table 2 (item 6)
- (p) Table 8



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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Rockland Wood Products, LLC  
Source Address: 8089 North 200 West, Monon, Indiana 47959  
FESOP Permit No.: F181-26795-00041

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

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)\_\_\_\_\_
- ☐ Report (specify)\_\_\_\_\_
- ☐ Notification (specify)\_\_\_\_\_
- ☐ Affidavit (specify)\_\_\_\_\_
- ☐ Other (specify)\_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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**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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Rockland Wood Products, LLC  
Source Address: 8089 North 200 West, Monon, Indiana 47959  
FESOP Permit No.: F181-26795-00041

**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:

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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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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: \_\_\_\_\_

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Rockland Wood Products, LLC  
Source Address: 8089 North 200 West, Monon, Indiana 47959  
FESOP Permit No.: F181-26795-00041  
Facility: Wood fired boilers (5-001) and (5-002)  
Parameter: Amount of wood burned in two (2) wood fired boilers (5-001 and 5-002)  
Limit: The amount of wood burned in the two (2) wood-fired boilers (5-001 and 5-002) shall not exceed a combined total of 20,600 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Rockland Wood Products, LLC  
Source Address: 8089 North 200 West, Monon, Indiana 47959  
FESOP Permit No.: F181-26795-00041  
Facility: Wood undercoating booth (5-013)  
Parameter: Amount of paint applied  
Limit: The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Rockland Wood Products, LLC  
Source Address: 8089 North 200 West, Monon, Indiana 47959  
FESOP Permit No.: F181-26795-00041

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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”.

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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:**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a Significant Permit Revision to a Federally  
Enforceable State Operating Permit (FESOP) Renewal

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>Rockland Wood Products, LLC</b>
<b>Source Location:</b>	<b>8089 N 200 W, Monon, IN 47959</b>
<b>County:</b>	<b>White</b>
<b>SIC Code:</b>	<b>2426 (Hardwood Dimension and Flooring Mills)</b>
<b>Operation Permit No.:</b>	<b>F181-26795-00041</b>
<b>Operation Permit Issuance Date:</b>	<b>May 13, 2009</b>
<b>Significant Permit Revision No.:</b>	<b>181-35715-00041</b>
<b>Permit Reviewer:</b>	<b>Adam Wheat</b>

On April 15, 2015, the Office of Air Quality (OAQ) received an application from Rockland Wood Products, LLC related to a modification to an existing stationary laminate floor manufacturing facility.

<b>Existing Approvals</b>
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The source was issued FESOP Renewal No. F181-26795-00041 on May 13, 2009. The source has since received Significant Permit Revision No. 181-33844-00041, issued on April 15, 2014.

<b>County Attainment Status</b>
---------------------------------

The source is located in White County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. White County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
White County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) Other Criteria Pollutants  
White County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.



### Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

### Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of SPR No. 181-33844-00041, issued on April 15, 2014.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Proposed Revision (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP (HCl)
Woodworking Shop (5-003)	19.89	19.89	19.89	-	-	-	-	-	-
Wood Gluing (5-012)	-	-	-	-	-	1.82	-	3.62	3.62
Wood Undercoating Booth (5-013)	7.07	7.07	7.07	-	-	24.65	-	1.02	-
Wood Fired Boilers (5-001 and 5-002)	65.92	62.13	53.89	4.12	80.75	-	98.88	5.52	3.13
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Unpaved Roads	0.12	0.03	3.1E-3	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	0.02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.0	-	1.00	-
<b>Total PTE of Entire Source</b>	<b>99.09</b>	<b>94.82</b>	<b>86.55</b>	<b>4.23</b>	<b>81.71</b>	<b>39.81</b>	<b>99.6</b>	<b>11.18</b>	<b>7.75 (HCl)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									
** PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).

- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

#### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Rockland Wood Products, LLC on April 15, 2015, relating to a modification of the wood undercoating booth (5-013) to utilize a new coating. The source also requested that the current limits for the wood undercoating booth (5-013) in Condition D.1 be revised to allow greater operational flexibility in coating usage. The source also requested the addition of a third adhesive option in the wood gluing operation. This additional adhesive option does not increase the potential to emit of the source.

The following is a list of the modified emission units and pollution control device:

- (a) One (1) wood undercoating booth, identified as 5-013, with four (4) spray guns and one (1) backup gun, with a maximum throughput rate of 24.0 gallons of coating per hour, per gun, using dry filters as control, constructed in 1995, approved in 2014 for modification.

#### Enforcement Issues

There are no pending enforcement actions related to this revision.

#### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

#### Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE Increase of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
PTE Increase of Wood Undercoating Booth (5-013)	1.52	1.52	1.52	-	-	0.0	-	5.36	5.36 (Vinyl Acetate)
<b>Total PTE of Proposed Revision</b>	<b>1.52</b>	<b>1.52</b>	<b>1.52</b>	<b>-</b>	<b>-</b>	<b>0.0</b>	<b>-</b>	<b>5.36</b>	<b>5.36 (Vinyl Acetate)</b>

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves adjusting FESOP and PSD minor limits.

#### PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~struck through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP (HCl)
Woodworking Shop (5-003)	19.89	19.89	19.89	-	-	-	-	-	-
Wood Gluing (5-012)	-	-	-	-	-	1.82	-	3.62	3.62
Wood Undercoating Booth (5-013)	<del>7.07</del> <b>8.59</b>	<del>7.07</del> <b>8.59</b>	<del>7.07</del> <b>8.59</b>	-	-	24.65	-	<del>4.02</del> <b>6.38</b>	-
Wood Fired Boilers (5-001 and 5-002)	65.92	62.13	53.89	4.12	80.75	2.80	98.88	5.52	3.13
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Unpaved Roads	<del>0.12</del> <b>0.24</b>	<del>0.03</del> <b>0.06</b>	<del>3.1E-03</del> <b>6.1E-03</b>	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	0.02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.0	-	1.00	1.00
Total PTE of Entire Source	<del>99.09</del> <b>100.68</b>	<del>94.82</del> <b>96.33</b>	<del>86.55</del> <b>88.03</b>	4.23	81.71	39.81	99.6	<del>11.18</del> <b>16.53</b>	7.75 (HCl)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									
** PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP (HCl)
Woodworking Shop (5-003)	19.89	19.89	19.89	-	-	-	-	-	-
Wood Gluing (5-012)	-	-	-	-	-	1.82	-	3.62	3.62
Wood Undercoating Booth (5-013)	8.59	8.59	8.59	-	-	24.65	-	6.38	-
Wood Fired Boilers (5-001 and 5-002)	65.92	62.13	53.89	4.12	80.75	2.80	98.88	5.52	3.13
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Unpaved Roads	0.24	0.06	6.1E-03	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	0.02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.0	-	1.00	1.00
Total PTE of Entire Source	<b>100.68</b>	<b>96.33</b>	<b>88.03</b>	<b>4.23</b>	<b>81.71</b>	<b>39.81</b>	<b>99.6</b>	<b>16.53</b>	<b>7.75 (HCl)</b>
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									
** PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

(a) FESOP and PSD Minor Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, HAPs and CO<sub>2</sub>e from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM, PM10, and PM2.5 from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(1) Criteria Pollutants

Pursuant to 326 IAC 2-8-4 (FESOP), and order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (A) The PM emissions from by the wood undercoating booth (5-013) shall not exceed 8.59 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (B) The PM10 and PM2.5 emissions from the wood undercoating booth (5-013) shall each not exceed 8.59 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (C) The VOC input to the wood undercoating booth (5-013) shall be less than 24.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (D) The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.
- (E) The density of any paint applied in the wood undercoating booth (5-013) shall not exceed 10.50 pounds per gallon of coating.
- (F) The solids content of any paint applied in the wood undercoating booth (5-013) shall not exceed 55.0% by weight solids.
- (G) The VOC content of any paint applied in the wood undercoating booth (5-013) shall not exceed 0.29 pounds per gallon of coating.
- (H) The transfer efficiency (%) of the spray applicators in the wood undercoating booth (5-013) shall be equal to or greater than 65% at all times.
- (I) The control efficiency (%) of the dry filters in the wood undercoating booth (5-013) shall be equal to or greater than 95% at all times.

Compliance with these limits, combined with the potential to emit of PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOC to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(2) HAPs

Pursuant to 326 IAC 2-8-4 (FESOP) and in render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, the Permittee shall comply with the following:

- (A) The input of any combination of HAPs to wood undercoating booth (5-013) shall be less than 6.38 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (B) The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.
- (C) The HAP content of any coating applied by the wood undercoating booth (5-013) shall not exceed 0.075 pounds per gallon of coating.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included for this proposed revision, since the undercoating booth (5-013) at this source does not coat metal furniture. The source manufactures wood flooring.
- (b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating, 40 CFR 60, Subpart MM (326 IAC 12), are not included for this proposed revision, since this source is not located at an automobile or light-duty truck assembly plant.
- (c) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliance, 40 CFR 60, Subpart SS (326 IAC 12), are not included for this proposed revision, since the undercoating booth (5-013) is not located in a large appliance surface coating line.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) (63.800 through 63.808) (326 IAC 20-14), are not included for this proposed revision, since this source does not coat wood furniture and is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (4I), (326 IAC 20-85), is not included for this proposed revision, since this source does not coat automobile or light duty truck body parts and is not a major source of HAPs.

- (g) The requirements for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans (40 CFR 63, Subpart KKKK (63.3480 through 63.3561) (326 IAC 20-86) are not included for this proposed revision, since the source does not engage in the coating of metal cans and is not a major source of HAPs. The source manufactures wood flooring.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included for this proposed revision, since this source does not coat metal parts and is not a major source of HAPs.
- (i) The requirements for the National Emission Standards For Hazardous Air Pollutants: Surface Coating of Large Appliances 40 CFR 63, Subpart NNNN (63.4080 through 63.4181) (326 IAC 20-63) are not included for this proposed revision, since the source does not engage in the coating of large appliances and is not a major source of HAPs. The source manufactures wood flooring.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not included for this proposed revision for the surface coating operation, since this source does not perform surface coating of plastic parts or plastic products and is not a major source of HAPs. The source coats wood flooring.
- (k) The requirements for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products 40 CFR 63, Subpart QQQQ (63.4680 through 63.4768) (326 IAC 20-79) are not included for this proposed revision, since the source does not manufacture wood products that are used in the construction of a residential, commercial, or institutional building and is not a major source of HAPs.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included for this proposed revision, since this source and does not coat metal furniture and is not a major source of HAPs. The source coats wood flooring.
- (m) The requirements for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil 40 CFR 63, Subpart SSSS (63.5080 through 63.5200) (326 IAC 20-64) are not included for this proposed revision, since the source does not engage in the surface coating of metal coil and is not a major source of HAPs. The source manufactures wood flooring.
- (n) The requirements of 40 CFR Part 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources), are not included for this proposed revision, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, perform spray application of coatings to mobile vehicles and mobile equipment, or perform spray application of a coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrate. While the thermal spray booths do utilize a coating that contains chromium, lead, manganese, nickel, or cadmium to coat a plastic and/or metal substrates.
- (o) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

#### Compliance Assurance Monitoring (CAM)

- (p) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
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- (a) **326 IAC 2-8-4 (FESOP)**  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the modified unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) **326 IAC 2-6 (Emission Reporting)**  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) **326 IAC 5-1 (Opacity Limitations)**  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) **326 IAC 12 (New Source Performance Standards)**  
See Federal Rule Applicability Section of this TSD.
- (h) **326 IAC 20 (Hazardous Air Pollutants)**  
See Federal Rule Applicability Section of this TSD.

**Wood Undercoating Booth (5-013)**

- (i) **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**  
The proposed revision is subject to the requirements of 326 IAC 6-3-2(d), since the undercoating operation is considered a surface coating operation that uses greater than 5 gallons per day. The wood undercoating booth shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications
- (j) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**  
The unlimited VOC potential emissions from the modified unit is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the modified unit to

less than twenty-five (25) tons per year. Therefore, the proposed revision is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the VOC input to the undercoating booth (5-013) shall be less than 24.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the wood undercoating booth (5-013) to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

- (k) There are no other 326 IAC 8 Rules that are applicable to this unit.

#### Compliance Determination, Monitoring and Testing Requirements

IDEM has moved the numerical limits previously present in Condition D.1.8 from the Compliance Determination Section of the permit to the Emission Limitations and Standards Section of the permit. The source requested these new emission limits be adjusted for greater operational flexibility. These changes are show in the Proposed Changes section below.

All other existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in the permit.

#### Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) Section D.1 has been modified to reflect new limits for the wood undercoating booth (5-013) to allow for an additional coating to be used.
- (2) Previous Compliance Determination Requirements have been removed from the permit for the wood undercoating booth (5-013).

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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##### Emission Limitations and Standards [326 IAC 2-8-4(1)]

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#### D.1.2 Particulate Matter PSD Minor Limitation (PM) [326 IAC 2-2]

In order to render **the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))** not applicable, the Permittee shall comply with the following:

- (a) The PM emissions from the woodworking shop (5-003) shall not exceed 4.54 pounds per hour.
- (b) The PM emissions from by the **wood** undercoating ~~paint~~ booth (5-013) shall not exceed ~~7.07~~ **8.59** tons per twelve consecutive month period with compliance determined at the end of each month.
- (c) **The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.**



- (d) The density of any paint applied in the wood undercoating booth (5-013) shall not exceed 10.50 pounds per gallon of coating.
- (e) The solids content of any paint applied in the wood undercoating paint-booth (5-013) shall not exceed 55.0% by weight solids.
- (f) The transfer efficiency (%) of the spray applicators in the wood undercoating paint booth (5-013) shall be equal to or greater than 65% at all times.
- (g) The control efficiency (%) of the dry filters in the wood undercoating paint-booth (5-013) shall be equal to or greater than 95% at all times.

Compliance with these limits, in conjunction with the PM PTE from other emission units at this source, shall limit the source wide PM emissions to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 PM10 and PM2.5 [326 IAC 2-8-4] [326 IAC 2-2]

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**Pursuant to 326 IAC 2-8-4 (FESOP), and order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:**

- (a) Pursuant to 326 IAC 2-8-4 and 326 IAC 2-2, the Permittee shall limit the The PM10 and PM2.5 emissions from the woodshop, identified as (5-003), to less than shall not exceed 4.54 pounds per hour, each.
- (b) Pursuant to 326 IAC 2-8-4 and 326 IAC 2-2, the Permittee shall limit the The PM10 and PM2.5 emissions from the wood undercoating paint booth (5-013) shall each not exceed 7.07 8.59 tons per twelve consecutive month period with compliance determined at the end of each month.
- (c) The amount of paint applied in the wood undercoating paint-booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.
- (d) The density of any paint applied in the wood undercoating booth (5-013) shall not exceed 10.50 pounds per gallon of coating.
- (e) The solids content of any paint applied in the wood undercoating booth (5-013) shall not exceed 55.0% by weight solids.
- (f) The transfer efficiency (%) of the spray applicators in the wood undercoating booth (5-013) shall be equal to or greater than 65% at all times.
- (g) The control efficiency (%) of the dry filters in the wood undercoating booth (5-013) shall be equal to or greater than 95% at all times.

Compliance with these limits, in conjunction with the PM10 and PM2.5 PTE from other emission units at this source, shall limit the source wide PM10 emissions and PM2.5 emissions to less than 100 tons per twelve (12) consecutive month period, respectively and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-1-6]

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**Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable, the Permittee shall comply with the following:**

- (a) The VOC input to the **wood** undercoating ~~paint~~ booth (5-013) shall be less than 24.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) **The amount of paint applied in the wood undercoating ~~paint~~ booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.**
- (c) **The VOC content of any paint applied in the wood undercoating booth (5-013) shall not exceed 0.29 lb VOC per gallon of coating.**

Compliance with the above limits, combined with the PTE VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and **shall** render the requirements of 326 IAC 2-7 (Part 70 **Permits**) not applicable.

Compliance with the above limits shall limit the VOC from the **wood** undercoating ~~paint~~ booth (5-013) to less than twenty-five (25) tons per twelve (12) consecutive month period and **shall** render the requirements of 326 IAC 8-1-6 (~~BACT~~**VOC Rules: General Reduction Requirements for New Facilities**) not applicable.

#### D.1.5 Hazardous Air Pollutants **[326 IAC 2-8-4]** [326 IAC 2-4.1]

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**Pursuant to 326 IAC 2-8-4 (FESOP), and in order to ensure this is not a major source of HAPs, as defined in 40 CFR 63.411, render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable, the Permittee shall comply with the following:**

- (a) The input of any combination of HAPs to wood undercoating booth (5-013) shall be less than ~~4.02~~ **6.38** tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) **The amount of paint applied in the wood undercoating ~~paint~~ booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.**
- (c) **The HAP content of any paint applied in the wood undercoating booth (5-013) shall not exceed 0.075 lb VOC per gallon of coating.**

~~Compliance with these limitations, in conjunction with HAP PTE for other emission units at this source, ensures that this is an area source for HAPs under Section 112 of the Clean Air Act.~~  
**Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.**

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#### Compliance Determination Requirements

##### D.1.7 Compliance Determination (PM/PM10)

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In order to ensure compliance with Conditions D.1.1, D.1.2, and D.1.3, particulate from the wood undercoating booth (5-013) shall be controlled by a dry particulate filter, and the Permittee shall operate the filter in accordance with the manufacturer's specifications, and the two (2) baghouses, identified as (5-003a and 5-003b), for PM10 and PM2.5 control shall be in operation

and control emissions from the Woodworking shop, ~~identified as (5-003),~~ facility at all times the Woodworking shop facility is in operation.

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~~D.1.8 PM, PM10, PM2.5, VOC, and HAP Emissions Compliance Determination~~

~~In order to ensure compliance with Conditions D.1.2(b), D.1.3(b), D.1.4, and D.1.5, the Permittee shall comply with the following for the undercoating spray booth (5-013):~~

- ~~(a) The amount of paint applied shall not exceed 170,000 gallons per twelve consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The solids content of the paint applied shall not exceed 47.5% by weight solids.~~
- ~~(c) The VOC content of the paint applied shall not exceed 0.29 lb VOC per gallon of undercoating.~~
- ~~(d) The HAP content of the paint applied shall not exceed 0.012 lb VOC per gallon of undercoating.~~
- ~~(e) The transfer efficiency (%) of the spray applicators shall be equal to or greater than 65% at all times.~~
- ~~(f) The control efficiency (%) of the dry filters shall be equal to or greater than 95% at all times.~~

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

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~~D.1.98 Visible Emissions Notations~~

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~~D.1.409 Broken or Failed Bag Detection~~

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~~D.1.4410 Monitoring~~

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Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

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~~D.1.4211 Record Keeping Requirements~~

- (a) To document the compliance status with Condition D.1.408, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse shop stack exhaust. 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 Conditions D.1.4410, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) To document the compliance status with Conditions D.1.2(b), (c), (d), (e), (f), and (g), D.1.3(b), (c), (d), (e), (f), and (g), D.1.4(b) and (c), and D.1.5(b) and (c), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to demonstrate compliance with the PM/PM10/PM2.5/VOC/HAP emission limits established in Conditions D.1.2(b), (c), (d), (e), (f), and (g), D.1.3(b), (c), (d), (e), (f), and (g), and D.1.4(b) and (c), and D.1.5(b) and (c).

- (1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The density and weight percent solids of each coating material used (as applied).
  - (3) The pounds/gallon of VOC of each coating material used (as applied).
  - (4) The pounds/gallon of HAP of each coating material used (as applied).
  - (5) The transfer efficiency (TE) of the spray guns in booth 5-013.
  - (6) The control efficiency (CE) of the dry filters on booth 5-013.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.1312 Reporting Requirements

---

A quarterly summary of the ~~amount of paint used covered by information to document the compliance status with~~ Conditions D.1.2(b)(c), D.1.3(c), and ~~D.1.3(d)~~ **D.1.4(b), and D.1.5(b),** ~~calculated in accordance with Condition D.1.5~~ shall be submitted using the reporting forms located at the end of this permit, or ~~their~~ **its** equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **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.

1. On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification. Therefore, IDEM, OAQ is making the following changes to the permit to remove all GHG related permit requirements:

#### C.2 Overall Source Limit [326 IAC 2-8]

---

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) ~~and greenhouse gases (GHGs)~~, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- ~~(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub>-equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.~~

\*\*\*

2. Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

Mailing Address: ~~8089 North 200 West, Monon, Indiana 47959~~

\*\*\*

3. Condition D.1.1 has been revised to remove the requirements of 326 IAC 6-3-2(d)(2), which do not apply to permits issued under 326 IAC 2-8 (FESOP).

#### SECTION D.1

#### EMISSIONS UNIT OPERATION CONDITIONS

\*\*\*

##### D.1.1 Particulate Matter [326 IAC 6-3]

\*\*\*

- (b) Pursuant to 326 IAC 6-3-2(d), particulate from the wood undercoating booth (5-013) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

~~If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:~~

- ~~(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.~~
- ~~(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.~~

~~If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.~~

\*\*\*

4. IDEM, OAQ made additional revisions to the permit as described below in order to provide clarification regarding the requirements of these conditions. IDEM has decided to clarify that a certification needs to meet the requirements of 326 IAC 2-8-5(a)(1). In addition, IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already addresses this issue. IDEM, OAQ has

clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

\*\*\*

### D.2.1 PM, PM10, PM2.5, NOx, CO FESOP and PSD Minor Limitation [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, **and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable**, the Permittee shall comply with the following:

- (a) The ~~maximum~~ amount of wood burned in the two (2) wood-fired boilers, ~~identified as (5-001 and 5-002)~~, shall not exceed a combined total of 20,600 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

\*\*\*

### D.2.2 Particulate [326 IAC 6-2-3] [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the PM emissions from all facilities use for indirect heating purposes which were existing and in operation after June 8, 1972, shall ~~in no case not~~ exceed 0.6 pounds of particulate matter per million British thermal units heat input. Therefore, the wood fired boiler, ~~identified as (5-001)~~, shall ~~be limited to~~ **not exceed** 0.6 pounds of particulate matter per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the wood fired boiler, ~~identified as (5-002)~~, which was existing and in operation after September 21, 1983, shall ~~be limited to~~ **not exceed** 0.38 pounds per million British thermal units heat input.

\*\*\*

### D.2.5 Wood-Fired Boiler Operation

When burning wood in the two (2) wood-fired boilers, ~~identified as (5-001 and 5-002)~~, the Permittee shall comply with the following:

\*\*\*

### D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of visible emission notations of the two (2) wood fired boilers stack exhaust, ~~identified as (5-001 and 5-002)~~. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

\*\*\*

### D.2.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with **Condition D.2.1(a) and D.2.2(a)** shall be submitted **using the reporting form located at the end of this permit, or its equivalent**, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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)~~ **326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

\*\*\*

EMERGENCY OCCURRENCE REPORT FORM:

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~~A certification is not required for this report.~~

\*\*\*

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Rockland Wood Products, LLC  
Source Address: 8089 North 200 West, Monon, Indiana 47959  
Mailing Address: 8089 North 200 West, Monon, Indiana 47959  
FESOP Permit No.: F181-26795-00041  
Facility: Wood fired boilers (5-001) and (5-002)  
Parameter: Amount of wood burned in two (2) wood fired boilers (5-001 and 5-002) ~~in tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~  
Limit: ~~20,600 tons per year~~ **The amount of wood burned in the two (2) wood-fired boilers (5-001 and 5-002) shall not exceed a combined total of 20,600 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
<del>Month 1</del>			
<del>Month 2</del>			
<del>Month 3</del>			

- ☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

~~Attach a signed certification to complete this report.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Rockland Wood Products, LLC  
Source Address: 8089 North 200 West, Monon, Indiana 47959  
Mailing Address: 8089 North 200 West, Monon, Indiana 47959  
FESOP Permit No.: F181-26795-00041  
Facility: Wood undercoating booth (5-013)  
Parameter: Amount of paint ~~used~~ **applied**  
Limit: ~~170,000 gallons per twelve (12) consecutive period.~~ **The amount of paint applied in the wood undercoating booth (5-013) shall not exceed 170,000 gallons per twelve consecutive month period, with compliance determined at the end of each month.**

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
<del>Month 1</del>			
<del>Month 2</del>			
<del>Month 3</del>			

- ☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

~~Attach a signed certification to complete this report.~~

\*\*\*

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT FORM:

\*\*\*

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".

\*\*\*

~~Attach a signed certification to complete this report.~~

\*\*\*



<b>Conclusion and Recommendation</b>
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Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 15, 2015.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 181-35715-00041. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Adam Wheat 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) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (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**  
**PTE Summary of Revision**

Page 1 of 13 TSD App A

**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

**Unlimited PTE for Wood Undercoating Booth (Unit 5-013) from SPR 181-33844-00041**

Material	Density (lbs/gal)	VOC Content (lb/gal)	Vinyl Acetate (HAP) Content (lb/gal)	Weight % Solids	Transfer Efficiency	Maximum Usage Rate (gal/min)	Maximum Usage Rate (gal/hr)	Maximum Usage Rate (gal/yr)	Potential VOC (lbs/hour)	Potential VOC (lbs/day)	PTE VOC (tons/year)	*PTE PM/PM10/PM2.5 (tons/year)	Control Efficiency	*PTE PM/PM10/PM2.5 After Control (tons/year)	PTE Vinyl Acetate (HAP) (tons/year)
Tectyl 2500	10.01	0.29	0.0120	47.5%	65%	0.4	24.0	210,240	6.96	167.0	30.48	174.9	95%	8.7	1.26
<b>Worst case for a single spray gun:</b>						<b>0.40</b>	<b>24.0</b>	<b>210,240</b>	<b>6.96</b>	<b>167.0</b>	<b>30.48</b>	<b>174.9</b>		<b>8.7</b>	<b>1.26</b>
<b>Worst case for all four (4) spray guns:</b>						<b>1.60</b>	<b>96.0</b>	<b>840,960</b>	<b>27.8</b>	<b>668.2</b>	<b>121.9</b>	<b>699.7</b>		<b>34.99</b>	<b>5.05</b>

\* Assume PM emissions are equal to PM10.

**Unlimited New PTE for Wood Undercoating Booth (Unit 5-013)**

Material	Density (lbs/gal)	VOC Content (lb/gal)	Vinyl Acetate (HAP) Content (lb/gal)	Weight % Solids	Transfer Efficiency	Maximum Usage Rate (gal/min)	Maximum Usage Rate (gal/hr)	Maximum Usage Rate (gal/yr)	Potential VOC (lbs/hour)	Potential VOC (lbs/day)	PTE VOC (tons/year)	*PTE PM/PM10/PM2.5 (tons/year)	Control Efficiency	*PTE PM/PM10/PM2.5 After Control (tons/year)	PTE Vinyl Acetate (HAP) (tons/year)
Tectyl 2500	10.01	0.29	0.0120	47.5%	65%	0.4	24.0	210,240	6.96	167.0	30.48	174.9	95%	8.7	1.26
Deckbond Black/Catalyst A	8.84	0.03	0.0300	54.0%	65%	0.4	24.0	210,240	0.72	17.3	3.15	175.6	95%	8.8	3.15
<b>Worst case for a single spray gun:</b>						<b>0.40</b>	<b>24.0</b>	<b>210,240</b>	<b>6.96</b>	<b>167.0</b>	<b>30.5</b>	<b>175.6</b>		<b>8.78</b>	<b>3.15</b>
<b>Worst case for all four (4) spray guns:</b>						<b>1.60</b>	<b>96.0</b>	<b>840,960</b>	<b>27.8</b>	<b>668.2</b>	<b>121.9</b>	<b>702.5</b>		<b>35.13</b>	<b>12.61</b>

\* Assume PM emissions are equal to PM10.

**METHODOLOGY**

Maximum Usage Rate (gal/hr) = Maximum Usage Rate (gal/min) \* 60 (min/hr)  
Maximum Usage Rate (gal/yr) = Maximum Usage Rate (gal/hr) \* 8760 (hr/yr)  
Potential VOC (lbs/hr) = VOC Content (lb/gal) \* Maximum Usage Rate (gal/hr)  
Potential VOC (lbs/day) = Potential VOC (lbs/hour) \* 24 (hr/day)  
PTE VOC (tons/year) = Potential VOC (lbs/hr) \* 8760 (hrs/yr) / 2000 (tons/yr)  
PTE PM/PM10/PM2.5 (tons/year) = Density (lbs/gal) \* Maximum Usage Rate (gal/hr) \* Weight % Solids \* 8760 (hrs/yr) / 2000 (tons/yr) \* (1 - Transfer Efficiency(%))  
PTE PM/PM10/PM2.5 After Control (tons/year) = PTE PM/PM10/PM2.5 (tons/year) \* (1 - Control Efficiency (95%))  
PTE Vinyl Acetate (HAP) (tons/year) = Vinyl Acetate (HAP) Content (lb/gal) \* Maximum Usage Rate (gal/hr) \* 8760 (hrs/yr) / 2000 (tons/yr)

Limited Potential to Emit After Undercoating Usage Limits (Previously Permitted)			
Max Usage (gal/yr)	VOC (tons/year)	PM/PM10/PM2.5 (tons/year)	Vinyl Acetate (HAP) (tons/year)
170,000	<b>24.65</b>	<b>7.07</b>	<b>1.02</b>

Limited Potential to Emit After Undercoating Usage Limits (After Revision)			
Max Usage (gal/yr)	VOC (tons/year)	PM/PM10/PM2.5 (tons/year)	Vinyl Acetate (HAP) (tons/year)
170,000	<b>24.65</b>	<b>8.59</b>	<b>6.38</b>

PTE increase from Revision			
Wood Undercoating Booth (Unit 5-013)	VOC (tons/year)	PM/PM10/PM2.5 (tons/year)	Vinyl Acetate (HAP) (tons/year)
	<b>0.00</b>	<b>1.52</b>	<b>5.36</b>

**METHODOLOGY**

PTE Increase from Revision = Previously Permitted - After Revision

**Appendix A: Emissions Calculations  
PTE Summary**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

Uncontrolled Potential to Emit (tons/year) - Part 70 Determination											
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e 11/29/2013	CO <sub>2</sub> e 10/30/2009	Total HAPs	Worst Single HAP (HCl)
Wood Gluing (5-012)	-	-	-	-	-	1.82	-	-	-	3.62	3.62
Wood Undercoating (5-013)	702.52	702.52	702.52	-	-	121.94	-	-	-	12.61	-
Wood Fired Boiler (5-002)	50.86	47.94	41.58	3.18	62.30	2.16	76.29	27,011	26,995	4.26	2.42
Wood Fired Boiler (5-001)	54.14	51.02	44.26	3.38	66.32	2.30	81.21	28,751	28,734	4.53	2.57
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-	-	-
Unpaved Roads	0.48	0.12	0.01	-	-	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	1,037	1,037	1.6E-02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	-	-	1.00	1.00
<b>Sub-Total (Excludes Emission Units with Integral Devices)</b>	<b>814.04</b>	<b>807.27</b>	<b>794.03</b>	<b>6.67</b>	<b>129.58</b>	<b>138.76</b>	<b>158.22</b>	<b>56,798.46</b>	<b>56,765.48</b>	<b>26.05</b>	<b>9.61</b>
Emission Units with Integral Devices											
Woodworking Shop (5-003)	19.93	19.93	19.93	-	-	-	-	-	-	-	-
<b>Total</b>	<b>833.97</b>	<b>827.19</b>	<b>813.96</b>	<b>6.67</b>	<b>129.58</b>	<b>138.76</b>	<b>158.22</b>	<b>56,798.46</b>	<b>56,765.48</b>	<b>26.05</b>	<b>9.61</b>

\* PM2.5 listed is direct PM2.5

Note: PM, PM10, and PM2.5 emissions from the Woodworking Shop operations were calculated after consideration of the controls based on the integral to the process determination.

Uncontrolled Potential to Emit (tons/year) - PSD Determination											
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e 11/29/2013	CO <sub>2</sub> e 10/30/2009	Total HAPs	Worst Single HAP (HCl)
Sub-Total (Excludes Emission Units with Integral Devices)	814.04	807.27	794.03	6.67	129.58	138.76	158.22	56,798.46	56,765.48	26.05	9.61
Emission Units with Integral Devices											
Woodworking Shop (5-003)	1992.74	1992.74	1992.74	-	-	-	-	-	-	-	-
<b>Total</b>	<b>2,806.78</b>	<b>2,800.00</b>	<b>2,786.77</b>	<b>6.67</b>	<b>129.58</b>	<b>138.76</b>	<b>158.22</b>	<b>56,798.46</b>	<b>56,765.48</b>	<b>26.05</b>	<b>9.61</b>

\* PM2.5 listed is direct PM2.5

Note: Controls that are integral to the process are not considered for purposes of PSD.

Potential to Emit after Control (tons/year)											
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e 11/29/2013	CO <sub>2</sub> e 10/30/2009	Total HAPs	Worst Single HAP (HCl)
Woodworking Shop (5-003)	19.93	19.93	19.93	-	-	-	-	-	-	-	-
Wood Gluing (5-012)	-	-	-	-	-	1.82	-	-	-	3.62	3.62
Wood Undercoating (5-013)	8.59	8.59	8.59	-	-	24.65	-	-	-	6.38	-
Wood Fired Boiler (5-002)	50.86	47.94	41.58	3.18	62.30	2.16	76.29	27,011	26,995	4.26	2.42
Wood Fired Boiler (5-001)	54.14	51.02	44.26	3.38	66.32	2.30	81.21	28,751	28,734	4.53	2.57
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-	-	-
Unpaved Roads	0.48	0.12	1.2E-02	-	-	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	1,037	1,037	1.6E-02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	-	-	1.00	1.00
<b>Total</b>	<b>140.04</b>	<b>133.26</b>	<b>120.03</b>	<b>6.67</b>	<b>129.58</b>	<b>41.47</b>	<b>158.22</b>	<b>56798.46</b>	<b>56765.48</b>	<b>19.81</b>	<b>9.61</b>

\* PM2.5 listed is direct PM2.5

Note: PM, PM10, and PM2.5 missions from the Wood Undercoating operations were calculated after consideration of the controls based on the integral to the process determination.

**Appendix A: Emission Calculations  
PTE Summary**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

Potential to Emit after Issuance (tons/year) - Part 70 Determination											
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e 11/29/2013	CO <sub>2</sub> e 10/30/2009	Total HAPs	Worst Single HAP (HCl)
Wood Gluing (5-012)	-	-	-	-	-	1.82	-	-	-	3.62	3.62
Wood Undercoating (5-013)	8.59	8.59	8.59	-	-	24.65	-	-	-	6.38	-
Wood Fired Boiler (5-002) & Wood Fired Boiler (5-001) (combined)	65.92	62.13	53.89	4.12	80.75	2.80	98.88	35,009	34,988	5.52	3.13
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-	-	-
Unpaved Roads	0.24	0.06	6.1E-03	-	-	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	1,036.71	1,036.86	0.02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	-	-	1.00	1.00
<b>Sub-Total (Excludes Emission Units with Integral Devices)</b>	<b>80.80</b>	<b>76.44</b>	<b>68.15</b>	<b>4.23</b>	<b>81.71</b>	<b>39.81</b>	<b>99.60</b>	<b>36,045.35</b>	<b>36,024.70</b>	<b>16.53</b>	<b>7.75</b>
Emission Units with Integral Devices											
Woodworking Shop (5-003)	19.93	19.93	19.93	-	-	-	-	-	-	-	-
<b>Total</b>	<b>100.72</b>	<b>96.37</b>	<b>88.08</b>	<b>4.23</b>	<b>81.71</b>	<b>39.81</b>	<b>99.60</b>	<b>36,045.35</b>	<b>36,024.70</b>	<b>16.53</b>	<b>7.75</b>

\* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Note: PM, PM10, and PM2.5 missions from the Wood Undercoating operations were calculated after consideration of the controls based on the integral to the process determination.

Note: Although a fuel usage limitation for the wood fired boilers effectively limits VOC and CO<sub>2</sub>e, hourly limitations were not included in the permit.

Potential to Emit after Issuance (tons/year) - PSD											
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e 11/29/2013	CO <sub>2</sub> e 10/30/2009	Total HAPs	Worst Single HAP (HCl)
Sub-Total (Excludes Emission Units with Integral Devices)	80.80	76.44	68.15	4.23	81.71	39.81	99.60	36,045.35	36,024.70	16.53	7.75
Emission Units with Integral Devices											
Woodworking Shop (5-003)	19.89	19.89	19.89	-	-	-	-	-	-	-	-
<b>Total</b>	<b>100.68</b>	<b>96.33</b>	<b>88.03</b>	<b>4.23</b>	<b>81.71</b>	<b>39.81</b>	<b>99.60</b>	<b>36,045.35</b>	<b>36,024.70</b>	<b>16.53</b>	<b>7.75</b>

\* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Note: Controls that are integral to the process are not considered for purposes of PSD.

**Appendix A: Emissions Calculations  
Woodworking Shop (Unit 5-003)**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

*PM/PM10 Control Equipment = Two(2) Baghouses	
Outlet grain loading (grains/acf) =	0.0078
Air flow rate (acfm) =	68050
Control Efficiency (%) =	99%

\* Assume PM, PM2.5, emissions are equal to PM10

PTE PM/PM10/PM2.5 (After Control)		PTE PM/PM10/PM2.5 (Before Control)	
(lbs/hour)	(tons/year)	(lbs/hour)	(tons/year)
4.55	19.93	454.96	1992.74

PTE PM/PM10/PM2.5 (Limited)	
(lbs/hour)	(tons/year)
4.54	19.89

**Methodology**

Controls are considered 'Integral' to the woodworking process for Part 70 Applicability.

$$\text{PTE PM/PM10/PM2.5 (After Control) (lbs/hour)} = \text{Grain Loading (gr/acf)} * \text{Air Flow Rate (acf/min)} * 60 \text{ min/hour} * 1 \text{ lb/7000grains}$$

$$\text{PTE PM/PM10/PM2.5 (After Control) (tons/year)} = \text{PTE PM/PM10/PM2.5 (After Control) (lbs/hour)} * 8760 \text{ hours/year} * 1 \text{ ton/2000 lbs}$$

$$\text{PTE PM/PM10/PM2.5 (Before Control) (tons/year)} = \text{PTE PM/PM10/PM2.5 (After Control) (tons/year)} / (1 - \text{Control Efficiency})$$

$$\text{PTE PM/PM10/PM2.5 (Before Control) (lbs/hour)} = \text{PTE PM/PM10/PM2.5 (After Control) (lbs/hour)} / (1 - \text{Control Efficiency})$$

$$\text{PTE PM/PM10/PM2.5 (After Control) (tons/year)} = 4.54 \text{ lbs/hour} * 8760 \text{ hours/year} * 1 \text{ ton/2000 lbs}$$

**Appendix A: Emissions Calculations**  
**Wood Gluing (Unit 5-012)**  
**Options 1, 2, and 3**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

**Option 1**

Material	Max. Usage Rate (lbs/hour)	VOC Content (%)	*PTE VOC (tons/year)	*PTE of Formaldehyde (tons/year)
MU-400 Resin	59.40	0.7%	1.82	1.82

\* Assume all VOC emission is Formaldehyde

Material	Actual Usage Rate (lbs/year)	Actual Hours of Operation (hrs/yr)	NH <sub>4</sub> Cl Content (%)	Actual Usage Rate NH <sub>4</sub> Cl (lbs/year)	M.W NH <sub>4</sub> Cl	M.W NH <sub>3</sub>	PTE NH <sub>3</sub> (tons/yr)	M.W HCl	PTE HCl (tons/year)
CT-125	33444	4692	17%	5685	53.5	17	1.69	36.5	3.62

**METHODOLOGY**

PTE VOC (tons/year) = Max. Usage Rate (lbs/hour) \* VOC Content (%) \* 8760 hours/year \* 1 ton/2000 lbs

Actual Usage Rate NH<sub>4</sub>Cl (lbs/year) = Actual Usage Rate (lbs/year) \* NH<sub>4</sub>Cl (%)

PTE NH<sub>3</sub> (tons/year) = Mol. Wt NH<sub>3</sub>/Mol. Wt NH<sub>4</sub>Cl \* Actual Usage Rate NH<sub>4</sub>Cl (lbs/year) \* 1 ton/2000 lbs \* 8760 hrs/yr/4692 actual hours of operation hrs/yr

PTE HCl (tons/year) = Mol. Wt HCl/Mol. Wt NH<sub>4</sub>Cl \* Actual Usage Rate NH<sub>4</sub>Cl (lbs/year) \* 1 ton/2000 lbs \* 8760 hrs/yr/4692 actual hours of operation hrs/yr

**Option 2**

VOCs				
Product (HAP)	Max. Usage Rate (lbs/hour)	lbs VOC/lb Adhesive (Using Lab Results)	Molecular Weight	PTE VOC (tons/year) (Using Lab Results)
Momentive 4720H (1,4 Butanediol)*	59.4	0	90.12	0.000
Momentive 4720H (Formaldehyde)	59.4	0.00004	30.031	0.010
Momentive 4720H (Caprolactam)*	59.4	0	113.16	0.000
Momentive 4720H (Formaldehyde)	3.82	0.00004	30.031	0.001
Momentive 5000Q (Formic Acid)	3.82	0.00005	46.02538	0.001
4720H (Methanol as biproduct)	59.4	0.00244	32.04	0.635
<b>Total =</b>				<b>0.65</b>

\*1,4 Butanediol and Caprolactam were Non Detect in the Lab Results and are shown as 0 lbs VOC/lb Adhesive

HAPs				
Product (HAP)	Max. Usage Rate (lbs/hour)	lbs VOC/lb Adhesive (Using Lab Results)	Molecular Weight	PTE HAP (tons/year) (Using Lab Results)
Momentive 4720H (Formaldehyde)	3.82	0.00004	30.031	0.001
4720H (Methanol as biproduct)	59.4	0.00244	32.04	0.635
<b>Total HAPs =</b>				<b>0.64</b>

**METHODOLOGY**

PTE VOC (tons/year) = Max. Usage Rate (lbs/hour) \* lbs VOC/lb Adhesive (Using Lab Results) \* 8760 hours/year \* 1 ton/2000 lbs

PTE HAP (tons/year)(Using Lab Results) = Max. Usage Rate (lbs/hr) \* lbs VOC/lb Adhesive (Using Lab Results) \* 8760 hrs/yr \* 1ton/2000 lbs

**Option 3**

Material	Max. Usage Rate (lbs/hour)	VOC Content (%)	PTE VOC (tons/year)
Hexion Cascomel	59.40	0.1%	0.27

Material	Max. Usage Rate (lbs/year)	Formaldehyde Content (%)	Methanol Content (%)	Formic Acid Content (%)	Formaldehyde Emissions (tons/yr)	Methanol Emissions (tons/yr)	Formic Acid Emissions (tons/yr)	Total HAPs (tons/yr)
Hexion Cascomel	520,344	0.003%	0.100%	0.002%	0.008	0.26	0.005	0.273

**METHODOLOGY**

PTE VOC (tons/year) = Max. Usage Rate (lbs/hour) \* VOC Content (%) \* 8760 hours/year \* 1 ton/2000 lbs

Max. Usage Rate (lbs/yr) = Max Usage Rate (lbs/hr) \* 8760 (hrs/yr)

HAP Emissions (tons/yr) = Max. Usage Rate (tons/yr) \* HAP Content (%)

**Wood Gluing Worse Case Scenario**

	PTE VOC (tons/year)	Formaldehyde Emissions (tons/yr)	Methanol Emissions (tons/yr)	Formic Acid Emissions (tons/yr)	HCl Emissions (tons/yr)
Worst Case Potential to Emit	1.82	0.008	0.635	0.005	3.62
Wood Gluing Option	Option 1	Option 3	Option 2	Option 3	Option 1
	Worst Case Scenario				
	PTE VOC (tons/year)	Highest Single HAP (HCl)	Total HAP Emissions		
Wood Gluing Option 1	1.82	3.62	3.62		

**Appendix A: Emissions Calculations  
Wood Undercoating Booth (Unit 5-013)**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

Worst-case Unlimited PTE

Material	Density (lbs/gal)	VOC Content (lb/gal)	HAP Content (lb/gal)	Weight % Solids	Transfer Efficiency	Maximum Usage Rate (gal/min)	Maximum Usage Rate (gal/hr)	Maximum Usage Rate (gal/yr)	Potential VOC (lbs/hour)	Potential VOC (lbs/day)	PTE VOC (tons/year)	*PTE PM/PM10/PM2.5 (tons/year)	***PTE PM/PM10/PM2.5 After Control (tons/year)	Total HAP (tons/year)
Deckbond Black/Catalyst A	8.84	0.03	0.0300	54.0%	65%	0.4	24.0	210240	0.72	17.3	3.15	175.6	8.8	3.15
Tectyl 2500	10.01	0.29	0.0120	47.5%	65%	0.4	24.0	210240	6.96	167.0	30.48	174.9	8.7	1.26
<b>Worst-case PTE of a single spray gun:</b>									<b>6.96</b>	<b>167.04</b>	<b>30.48</b>	<b>175.63</b>	<b>8.78</b>	<b>3.15</b>
<b>Worst-case PTE for four(4) spray guns:</b>									<b>27.84</b>	<b>668.16</b>	<b>121.94</b>	<b>702.52</b>	<b>35.13</b>	<b>12.61</b>

Potential to Emit After Undercoating Usage Limits									
Max Usage (gal/yr)	Density (lbs/gal)	Solids Content (%)	VOC Content (lb/gal)	HAP Content (lb/gal)	Transfer Efficiency	Control Efficiency	VOC (tons/yr)	PM/PM10/PM2.5 (tons/yr)	Total HAP (tons/yr)
170,000	10.50	55%	0.29	0.075	65%	95%	<b>24.65</b>	<b>8.59</b>	<b>6.38</b>

\* Assume PM emissions are equal to PM10.

\*\* Material applied using four (4) airless pressure pot guns

\*\*\*The PM emissions are controlled by dry filters with a control efficiency of 95%

**Note:** There are no HAP emissions in the coating applied

**METHODOLOGY**

**PTE Before Control**

PTE VOC (lbs/hour) = VOC Content (lbs/gal) \* Max Usage Rate (gal/hour)

PTE VOC (lbs/day) = VOC Content (lbs/gal) \* Max. Usage Rate (gal/hour) \* (24 hr/day)

PTE VOC (tons/year) = VOC Content (lb/gal) \* Max Usage Rate (gal/hour) \* 8760 hours/year \* 1 ton/2000 lbs

PTE PM/PM10/PM2.5 (tons/year) = Density (lb/gal) \* Max Usage (gal/hour) \* Weight % Solids \* 8760 hours/yr \* 1 ton/2000lbs \* (1-Transfer Efficiency %)

**PTE After Control**

PTE PM/PM10/PM2.5 (tons/year) = Density (lb/gal) \* Max Usage (gal/hour) \* Weight % Solids \* 8760 hours/yr \* 1 ton/2000lbs \* (1-Transfer Efficiency %) \* (1-Control Efficiency %)

PTE VOC after limit = VOC Content (lbs/gal) \* Max Usage (gal/yr) \* 1 ton/2000 lbs

PTE PM/PM10/PM2.5 after limit = Density (lb/gal) \* Max Usage (gal/yr) \* Weight % Solids \* 1 ton/2000lbs \* (1-Transfer Efficiency %) \* (1-Control Efficiency %)

**Appendix A: Emissions Calculations**  
**Dutch Oven Boiler - Dry Wood Waste Combustion - (Unit 5-002)**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

Capacity (MMBtu/hr) 29.03

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.4	0.377	0.327	0.025	0.49	0.017	0.6
Potential Emissions in tons/yr	50.86	47.94	41.58	3.18	62.30	2.16	76.29

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.  
 Note: Rockland burns only dry wood (less than 20 weight % moisture) in this boiler.

\*The PM10 and PM2.5 emission factors include the condensable PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**Hazardous Air Pollutants (HAPs)**

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor (lb/MMBtu)	0.004	0.004	0.004	0.019	0.002
Potential To Emit (tons/year)	0.51	0.53	0.56	2.42	0.24

**Potential Emission of Total HAPs (tons/yr) 4.26**

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1 ton/2000lbs  
 These factors include the five (5) HAPs with the highest AP-42 emission factors.

**Green House Gas Emissions (GHG)**

	Pollutant		
	CO2	CH4	N2O
Emission Factor in kg/MMBtu from 40 CFR 98	93.8	0.032	
Emission Factor in lb/MMBtu from AP-42			0.013
Potential Emission in tons/yr	26,294	9	2

<b>Summed Potential Emissions in tons/yr</b>	<b>26,305</b>
<b>CO2e Total in tons/yr based on 11/29/2013 federal GWPs</b>	<b>27,011</b>
<b>CO2e Total in tons/yr based on 10/30/2009 federal GWPs</b>	<b>26,995</b>

CO2 and CH4 Emission Factors from Tables C-1 and 2 of 40 CFR Part 98 Subpart C. N2O emission factor from AP-43 Chapter 1.6 (revised 3/02).

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

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (kg/mmBtu) x 2.20462 lb/kg x 8760 hrs/yr /2,000 lb/ton

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (lb/mmBtu) x 8760 hrs/yr /2,000 lb/ton

CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (25) + N2O Potential Emission tons/year x N2O GWP (298).

CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (21) + N2O Potential Emission tons/year x N2O GWP (310).

**Methodology**

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

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10<sup>6</sup> Btu) x 2000 lbs/1 ton



**Appendix A: Emissions Calculations  
Stoker Boiler - Dry Wood Waste Combustion - (Unit 5-001)**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

Capacity (MMBtu/hr) 30.9

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.4	0.377	0.327	0.025	0.49	0.017	0.6
Potential Emissions in tons/yr	54.14	51.02	44.26	3.38	66.32	2.30	81.21

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

Note: Rockland burns only dry wood (less than 20 weight % moisture) in this boiler.

\*The PM10 and PM2.5 emission factors include the condensable PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**Hazardous Air Pollutants (HAPs)**

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor (lb/MMBtu)	0.004	0.004	0.004	0.019	0.002
Potential To Emit (tons/year)	0.54	0.57	0.60	2.57	0.26

**Potential Emission of Total HAPs (tons/yr) 4.53**

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1 ton/2000lbs

These factors include the five (5) HAPs with the highest AP-42 emission factors.

**Green House Gas Emissions (GHG)**

	Pollutant		
	CO2	CH4	N2O
Emission Factor in kg/mmBtu from 40 CFR 98	93.8	0.032	
Emission Factor in lb/mmBtu from AP-42			0.013
Potential Emission in tons/yr	27,988	10	2

<b>Summed Potential Emissions in tons/yr</b>		<b>27,999</b>
<b>CO2e Total in tons/yr based on 11/29/2013 federal GWPs</b>		<b>28,751</b>
<b>CO2e Total in tons/yr based on 10/30/2009 federal GWPs</b>		<b>28,734</b>

CO2 and CH4 Emission Factors from Tables C-1 and 2 of 40 CFR Part 98 Subpart C. N2O emission factor from AP-43 Chapter 1.6 (revised 3/02).

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

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (kg/mmBtu) x 2.20462 lb/kg x 8760 hrs/yr /2,000 lb/ton

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (lb/mmBtu) x 8760 hrs/yr /2,000 lb/ton

CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (25) + N2O Potential Emission tons/year x N2O GWP (298).

CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (21) + N2O Potential Emission tons/year x N2O GWP (310).

**Methodology**

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

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10<sup>6</sup> Btu) x 2000 lbs/1 ton

**Appendix A: Emissions Calculations**  
**Dutch Oven and Bigelow Wood Fired Boilers - Dry Wood Waste Combustion - (Units 5-001 and 5-002)**

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**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

Limited Capacity (tons/yr)	20,600
Limited Capacity (tons/hr)	2.352
Higher Heating Value of Fuel (Btu/lb)	8000
Converted Capacity in MMBtu/hr	37.63

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.4	0.377	0.327	0.025	0.49	0.017	0.6
Emission Factor in lb/ton	6.4	6.032	5.232	0.4	7.84	0.272	9.6
Potential Emissions in tons/yr	65.92	62.13	53.89	4.12	80.75	2.80	98.88

Emission Factor in (lb/ton wood) = EF (lb/MMBtu) x (1 MMBtu/1e6 Btu) x Heating Value of Fuel (Btu/lb) \*(2000 lb wood/ton wood)

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

Note: Rockland burns only dry wood (less than 20 weight % moisture) in boilers 5-001 and 5-002.

\*The PM10 and PM2.5 emission factors include the condensable PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu) x 2000 lbs/1 ton

**Hazardous Air Pollutants (HAPs)**

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor (lb/MMBtu)	0.004	0.004	0.004	0.019	0.002
Potential To Emit (tons/year)	0.66	0.69	0.73	3.13	0.31

<b>Potential Emission of Total HAPs (tons/yr)</b>	<b>5.52</b>
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Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers.  
Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1 ton/2000lbs  
These factors include the five (5) HAPs with the highest AP-42 emission factors.

**Green House Gas Emissions (GHG)**

	Pollutant		
	CO2	CH4	N2O
Emission Factor in kg/mmBtu from 40 CFR 98	93.8	0.032	
Emission Factor in lb/mmBtu from AP-42			0.013
Potential Emission in tons/yr	34,080	12	2

<b>Summed Potential Emissions in tons/yr</b>	<b>34,093</b>
<b>CO2e Total in tons/yr based on 11/29/2013 federal GWPs</b>	<b>35,009</b>
<b>CO2e Total in tons/yr based on 10/30/2009 federal GWPs</b>	<b>34,988</b>

CO2 and CH4 Emission Factors from Tables C-1 and 2 of 40 CFR Part 98 Subpart C. N2O emission factor from AP-43 Chapter 1.6 (revised 3/02).

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

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (kg/mmBtu) x 2.20462 lb/kg x 8760 hrs/yr /2,000 lb/ton

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (lb/mmBtu) x 8760 hrs/yr /2,000 lb/ton

CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (25) + N2O Potential Emission tons/year x N2O GWP (298).

CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (21) + N2O Potential Emission tons/year x N2O GWP (310).

**Methodology**

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

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10<sup>6</sup> Btu) x 2000 lbs/1 ton

**Appendix A: Emissions Calculations  
Wood Chip Storage Silo (5-004)**

Page 10 of 13 TSD App A

**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

<b>Cyclone</b>	tons/hr	EF lb/ton*	tons/year	control	tons/year controlled
PM	0.235	1	1.029	80%	0.206
PM10/PM2.5	0.235	0.58	0.597	80%	0.119

\* Emission factors are from FIRE, Wood Waste Storage Bin Vent, SCC 3-07-030-01

<b>Baghouse</b>	tons/hr	EF lb/ton**	tons/year	control	tons/year controlled
PM	0.235	2	2.059	99%	0.021
PM10/PM2.5	0.235	1.21	1.245	99%	0.012

\*\* Emission factors are from FIRE, Wood Waste Storage Bin Loadout, SCC 3-07-030-012

**Methodology**

PM2.5 is assumed equal to PM10.

tons/year = tons/hr \* EF lbs/ton \* 8760 hrs/yr / 2000 lbs/ton

tons/year controlled = tons/year \* control

**Appendix A: Emissions Calculations**  
**Insignificant Degreaser**

Page 11 of 13 TSD App A

**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

In order for the degreaser to qualify as an insignificant activity under the listing in 326 IAC 2-7-1(21)(J)(vi)(DD), the source shall use solvents "the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months".

Safety-Kleen Premium Solvent

The solvent has a maximum density of 6.7 lb/gal.

The solvent used in the degreaser contains 100% VOC and no HAPs listed in MSDS.

**Uncontrolled Potential Emissions**

6.7      lb/gal x      100      % VOC x      145      gal/yr ÷      2000      lb/ton =      0.49      tons VOC per year

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

Page 12 of 13 TSD App A

**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

Heat Input Capacity MMBtu/hr	HHV mmBtu	Potential Throughput MMCF/yr
2.0	mmscf	
5 units @ 0.4 MMBtu/hr	1020	17.2

	Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.02	0.07	0.07	0.01	0.86	0.05	0.72

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

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPs Calculations**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.8E-05	1.0E-05	6.4E-04	0.02	2.9E-05	0.02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.3E-06	9.4E-06	1.2E-05	3.3E-06	1.8E-05	4.7E-05
					<b>Total HAPs</b>	<b>0.02</b>
					<b>Worst HAP</b>	<b>0.02</b>

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

**Greenhouse Gas Calculations**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,031	0.02	0.02
Summed Potential Emissions in tons/yr	1,031		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	1,037		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	1,037		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (25) + N2O Potential Emission tons/year x N2O GWP (298).  
CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission tons/year x CO2 GWP (1) + CH4 Potential Emission tons/year x CH4 GWP (21) + N2O Potential Emission tons/year x N2O GWP (310).

**Appendix A: Emissions Calculations**  
**Fugitive Emissions From Unpaved Roads**

Page 13 of 13 TSD App A

**Company Name:** Rockland Wood Products  
**Source Address:** 8089 North 200 West, Monon, IN 47959  
**Operating Permit No.:** F181-26795-00041  
**Significant Permit Revision No.:** 181-35715-00041  
**Reviewer:** Adam Wheat

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	10.0	1.0	10.0	16.0	160.0	150	0.028	0.3	103.7
Vehicle (leaving plant) (one-way trip)	10.0	1.0	10.0	40.0	400.0	150	0.028	0.3	103.7
<b>Totals</b>			<b>20.0</b>		<b>560.0</b>			<b>0.6</b>	<b>207.4</b>

Average Vehicle Weight Per Trip = 28.0 tons/trip  
Average Miles Per Trip = 0.03 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	28.0	28.0	28.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$  (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$   
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	7.05	1.80	0.18	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	4.64	1.18	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/year)	Unmitigated PTE of PM10 (tons/year)	Unmitigated PTE of PM2.5 (tons/year)	Mitigated PTE of PM (tons/year)	Mitigated PTE of PM10 (tons/year)	Mitigated PTE of PM2.5 (tons/year)	Controlled PTE of PM (tons/year)	Controlled PTE of PM10 (tons/year)	Controlled PTE of PM2.5 (tons/year)
Vehicle (entering plant) (one-way trip)	0.37	0.09	0.01	0.24	0.06	0.01	0.12	0.03	3.1E-03
Vehicle (leaving plant) (one-way trip)	0.37	0.09	0.01	0.24	0.06	0.01	0.12	0.03	3.1E-03
<b>Totals</b>	<b>0.73</b>	<b>0.19</b>	<b>0.02</b>	<b>0.48</b>	<b>0.12</b>	<b>0.01</b>	<b>0.24</b>	<b>0.06</b>	<b>6.12E-03</b>

**Methodology**

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

**Abbreviations**

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



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

August 10, 2015

Mr. Matthew Clark  
Rockland Wood Products, LLC  
8089 N 200 W  
Monon, IN 47959

Re: Public Notice  
Rockland Wood Products, LLC  
Permit Level: Federally Enforceable State  
Operating Permit (FESOP) Significant Permit  
Revision  
Permit Number: 181-35715-00041

Dear Mr. Clark:

Enclosed is a copy of your draft Federally Enforceable State Operating Permit (FESOP) Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Herald Journal in Monticello, Indiana publish the abbreviated version of the public notice no later than August 10, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Monon Town & Township Public Library, 427 North Market Street in Monon, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Adam Wheat, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-8397 or dial (317) 233-8397.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permits Branch  
Office of Air Quality

Enclosures

PN Applicant Cover letter-2014. Dot4/10/14



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Commissioner

### ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 6, 2015

Herald Journal  
114 South Main Street  
Monticello, IN 47960

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Rockland Wood Products, LLC, White County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 11, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permit Branch  
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit (FESOP)  
Significant Permit Revision  
Permit Number: 181-35715-00041

Enclosure

PN Newspaper.dot 6/13/2013





## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence  
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Thomas W. Easterly  
Commissioner

August 10, 2015

To: Monon Town & Township Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Rockland Wood Products, LLC**  
**Permit Number: 181-35715-00041**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 6/13/2013



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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

### Notice of Public Comment

**August 10, 2015**  
**Rockland Wood Products, LLC**  
**181-35715-00041**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 6/13/13

# Mail Code 61-53

IDEM Staff	VHAUN 8/10/2015 Rockland Wood Products 181-35715-00041 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Matthew Clark Rockland Wood Products 8089 N 200 W Monon IN 47959 (Source CAATS)									
2		Brian Pogue Plant Mgr Rockland Wood Products 8089 N 200 W Monon IN 47959 (RO CAATS)									
3		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)									
4		Monon Town and Township Public Library 427 N. Market St Monon IN 47959 (Library)									
5		Monon Town Council and Town Manager P.O. Box 657 Monon IN 47959-0657 (Local Official)									
6		White County Commissioners P.O. Box 260 Monticello IN 47960-0260 (Local Official)									
7		Ms. Magie Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)									
8		White County Health Department 315 N Illinois St Monticello IN 47960 (Health Department)									
9		Cheryl Wise Wilcox Environmental Engineering 5757 W 74th St Indianapolis IN 46278-1755 (Consultant)									
10											
11											
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