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

Michael R. Pence
Governor

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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.: 181-36705-00041

The Indiana Department of Environmental Management (IDEM) has received an application from Rockland Wood Products, LLC, located at 8089 North 200 West Monon, Indiana 47969, 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 for the addition of a unthinned waterborne sealer booth utilizing already permitted surface coating applicators and the addition of existing 12 kilns utilized for drying wood.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the 12 kilns have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft FESOP SPR contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Monon Public Library
427 N Market St
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 30th 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 181-36705-00041 in all correspondence.

Comments should be sent to:

Allen Reimer
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0863
Or dial directly: (317) 233-0863
Fax: (317) 232-6749 attn: Allen Reimer
E-mail: acreimer@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 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Allen Reimer of my staff at the above address.

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

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DRAFT

Matthew Clark
Rockland Wood Products
8089 North 200 West
Monon, IN 47959

Re: 181-36705-00041
Significant Revision to
F181-26795-00041

Dear Matthew Clark:

Rockland Wood Products was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F181-26795-00041 on May 13, 2009 for a stationary laminate flooring manufacturing operation located at 8089 North 200 West, Monon, IN 47959. On Janurary 13, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to the addition of a unthinned waterborne wood sealer booth utilizing already permitted surface coating applicators and the addition of 12 existing kilns utilized for drying wood. The attached Technical Support Document (TSD) provides additional explanation changes to the source/permit. 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).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

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

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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 60.40c, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Attachment B: 40 CFR 63.11193, 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.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen Reimer of my staff at 317-234-4794 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,

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

Attachments: Technical Support Document and revised permit

NB/CM

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

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DRAFT

Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Rockland Wood Products, LLC
8089 North 200 West
Monon, Indiana 47959

(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: *Original Signed by:* 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 on September 15, 2015.

Significant Permit Revision No.: 181-36705-00041	
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)]

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

Source Address:	8089 North 200 West, Monon, Indiana 47959
General Source Phone Number:	(215) 253-8306
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)]

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) HVLP spray guns, 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.

Note: The Permittee will only combust clean wood in the wood-fired boiler (5-001). 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).

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.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). 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).

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

(f) One (1) unthinned waterborne wood sealer booth, identified as 5-014, approved in 2016 for construction, with a maximum throughput rate of 24.0 gallons of coating per hour, using one (1) HVLP spray applicator, using dry filters as control, and exhausting outside the building.

(g) Twelve (12) kilns, identified as units 1 through 12, constructed before 2003, with a total maximum capacity of 21,900 million square feet of 3/8th inch wood equivalent per year for all twelve units.

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

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.

(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 8-3-2, 326 IAC 8-3-8]

(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]

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).

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.

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

(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)]

(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).

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

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)]

(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]

(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 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.

(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.

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.

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.

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]

(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)]

(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 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]

(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]

(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

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;

(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]

(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]

(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]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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]

(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.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

(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)]

(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.

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]

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]

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]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(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]

(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]

(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.

(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

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

SECTION D.1 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) HVLP spray guns, 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.

(f) One (1) unthinned waterborne wood sealer booth, identified as 5-014, approved in 2016 for construction, with a maximum throughput rate of 24.0 gallons of coating per hour, using one (1) HVLP spray applicator, using dry filters as control, and exhausting outside the building.

(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:

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

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

(b) Pursuant to 326 IAC 6-3-2(d), particulate from the wood undercoating booth (5-013) and the wood sealer booth (5-014) 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.

(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:

(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 [326 IAC 2-8-4(1)]

D.1.7 Compliance Determination (PM/PM10/PM2.5)

In order to assure compliance with Conditions D.1.1, D.1.2, and D.1.3, particulate from the wood undercoating booth (5-013) and the wood sealer booth (5-014) 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 (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.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4(a)(3)(A)][326 IAC 8-1-2(a)]

Compliance with the VOC and HAP limitations contained in Conditions D.1.4 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAP data sheets or Certified Product Data Sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Visible Emissions Notations

(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.1.10 Broken or Failed Bag Detection

(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.

D.1.11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the wood undercoating booth (5-013) filters and wood sealer booth (5-014) 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.1.12 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.9, 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.1.11, 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.

D.1.13 Reporting Requirements

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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

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

Note: The Permittee will only combust clean wood in the wood-fired boiler (5-001). 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).

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, and exhausting at Stack 5-002a.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

The wood-fired dutch oven boiler, unit 5-002, is subject to NSPS Subpart Dc, and 40 CFR 63, Subpart JJJJJJ.

(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 15,000 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 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:

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

Where Pt = 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 [326 IAC 2-8-4(1)]

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 in the wood-fired boiler (5-001) and wood-fired dutch oven boiler (5-002). 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.

(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

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

(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

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).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(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 8-3-2, 326 IAC 8-3-8]

(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.

(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]

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

(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.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(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, and exhausting at Stack 5-002a.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). 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).

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)

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.

Note: The Permittee will only combust clean wood in the wood-fired boiler (5-001). 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).

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.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). 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).

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)
(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

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:

DRAFT

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**) daytime 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 2-8-12

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone:_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE 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 15,000 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:_____

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:_____

DRAFT

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:** _____

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:	

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Rockland Wood Products LLC**
Source Location:	**8089 North 200 West Monon, IN 47959**
County:	**White**
SIC Code:	**2426 (Hardwood Dimension and Flooring Mills)**
Operation Permit No.:	**F181-26795-00041**
Operation Permit Issuance Date:	**May, 13, 2009**
Significant Permit Revision No.:	**181-36705-00041**
Permit Reviewer:	**Clinton Mccrowey/Allen Reimer**

On Janurary 12, 2016, the Office of Air Quality (OAQ) received an application from Rockland Wood Products LLC related to a modification to an existing stationary laminate flooring manufacturing operation (truck trailer wood laminate floors).

Existing Approvals

The source was issued FESOP (Renewal) No. F181-26795-00041 on May 13,2009. The source has since received the following approvals:

(a) Significant Permit Revision No. 181-33844-00041 issued on April 15,2014; and

(b) Significant Permit Revision No. 181-35715-00041 issued on October 15,2014.

County Attainment Status

The source is located in White County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]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_x) 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_x 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_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
White County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) 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 181-35715-00041, issued on September 15, 2015.

	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
Process/ Emission Unit	PM	PM10*	PM2.5**	SO_2	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 (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	4.99
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-
Natural Gas Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	0.02	-
Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	1.00	1.00-
Total PTE of Entire Source	**82.52**	**79.38**	**73.38**	**4.23**	**81.71**	**39.81**	**99.60**	**16.53**	**9.61**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
Unpaved Roads	0.24	0.06	6.1E-03	-	-	-	-	-	-

* 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".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.

(a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, 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 unlimited potential to emit HAPs 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. 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 Janurary 12, 2016, relating to the addition of a unthinned waterborne sealer booth utilizing already permitted surface coating applicators and the addition of 12 existing kilns utilized for drying wood. The source also requested to adjust the existing permit limit on wood combustion from 20,600 tons per year to 15,000 tons per year.

The following is a list of the new emission units and pollution control devices:

(a) One (1) unthinned waterborne wood sealer booth, identified as 5-014, approved in 2016 for construction, with a maximum throughput rate of 24.0 gallons of coating per hour, using one (1) HVLP spray applicator, using dry filters as control, and exhausting outside the building.

(b) Twelve (12) kilns, identified as units 1 through 12, constructed before 2003, with a total maximum capacity of 21,900 million square feet of 3/8th inch wood equivalent per year for all twelve units.

Enforcement Issues

IDEM is aware that twelve (12) kilns were constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction and operating permit rules.

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.

	PTE of Proposed Revision (tons/year)								
Process/ Emission Unit	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
12 Kilns	3.83	10.95	10.95	-	-	20.30	1.18	1.53	0.80 (methanol)
Sealer Booth	16.93	16.93	16.93	-	-	3.35	-	1.34	1.34 (Diethylene Glycol Monobutyl Ether)
Total PTE of Proposed Revision	**20.76**	**27.88**	**27.88**	**-**	**-**	**23.65**	**1.18**	**2.88**	**1.34 (Diethylene Glycol Monobutyl Ether)**

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), 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 the construction of new and existing emission units with potential to emit greater than or equal to twenty-five (25) tons per year of PM10 and PM2.5.

In addition, 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 the existing permit limit on wood combustion from 20,600 tons per year to 15,000 tons per year.

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 ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After the Revision (tons/year)								
	PM	PM10*	PM2.5**	SO_2	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 (5-013)	8.59	8.59	8.59	-	-	24.65	-	6.38	-
Wood Fired Boilers (5-001 and 5-002)	~~65.92~~ **48.00**	~~62.13~~ **45.24**	~~53.89~~ **39.24**	~~4.12~~ **3.00**	~~80.75~~ **58.80**	~~2.80~~ **2.04**	~~98.88~~ **72.00**	~~5.52~~ **4.02**	~~4.99~~ **2.28**
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-
Natural Gas Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	0.02	-
Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	1.00	1.00
12 Kilns	**3.83**	**10.95**	**10.95**	**-**	**-**	**20.30**	**1.18**	**1.53**	**-**
Sealer Booth* **	**0.85**	**0.85**	**0.85**	**-**	**-**	**3.35**	**-**	**1.34**	**-**
Total PTE of Entire Source	~~82.52~~ **87.24**	~~79.38~~ **91.22**	~~73.38~~ **85.22**	~~4.23~~ **3.11**	~~81.71~~ **59.76**	~~39.81~~ **62.70**	~~99.60~~ **73.90**	~~16.53~~ **17.91**	~~9.61~~ **6.90**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
Unpaved Roads	0.24	0.06	6.1E-03	-	-	-	-	-	-

* 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".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
***Pursuant to 326 IAC 6-3-2(d), the particulate emissions from sealer booth shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the sealer booth to the values shown.

The table below summarizes the potential to emit of the entire source after issuance of this (revision or amendment), 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 After the Revision (tons/year)								
	PM	PM10*	PM2.5**	SO_2	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 (5-013)	8.59	8.59	8.59	-	-	24.65	-	6.38	-
Wood Fired Boilers (5-001 and 5-002)	48.00	45.24	39.24	3.00	58.80	2.04	72.00	4.02	2.28
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Degreaser	-	-	-	-	-	0.49	-	-	-
Natural Gas Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	0.02	-
Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	1.00	1.00
12 Kilns	3.83	10.95	10.95	-	-	20.30	1.18	1.53	-
Sealer Booth***	0.85	0.85	0.85	-	-	3.35	-	1.34	-
Total PTE of Entire Source	**87.24**	**91.22**	**85.22**	**3.11**	**59.76**	**62.70**	**73.90**	**17.91**	**6.90**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
Unpaved Roads	0.24	0.06	6.1E-03	-	-	-	-	-	-

	Potential To Emit of the Entire Source After the Revision (tons/year)								
Process/ Emission Unit	PM	PM10*	PM2.5**	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP (HCl)
* 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". **$PM_{2.5}$ listed is direct $PM_{2.5}$. ***Pursuant to 326 IAC 6-3-2(d), the particulate emissions from sealer booth shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the sealer booth to the values shown.									

(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 and HAPs 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 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.

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:

(1) The amount of wood burned in the two (2) wood-fired boilers (5-001 and 5-002) shall not exceed a combined total of 15,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) 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.

(3) 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.

(4) 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.

(5) 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.

(6) 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.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc is not included in the permit for this proposed revision, since the two (2) wood fired boilers identified as 5-002 and 5-001 were constructed before June 9, 1989.

(b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60 EE (2E) and 326 IAC 12 are not included in the permit for this proposed revision, since this source does not have metal furniture surface coating operations.

(c) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating, 40 CFR 60, Subpart MM (2M) (326 IAC 12), are not included in the permit for this proposed revision, since this source is not located at an automobile or light-duty truck assembly plant.

(d) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliance, 40 CFR 60, Subpart SS (2S) (326 IAC 12), are not included in the permit for this proposed revision, since the surface coating operation is not located in a large appliance surface coating line.

(e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) in the permit for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations 40 CFR Part 63, Subpart JJ (2J) (63.800 through 63.808) (326 IAC 20-14), are not included in the permit for this proposed revision, since this source does not coat wood furniture and is not a major source of HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, Subpart DDDD (4D), are not included in the permit for this proposed revision, since this source does manufacture plywood or composite wood products as defined by 40 CFR 63.2292, and the facility is not a major source of HAPs.

(c) 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), are not included in the permit 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.

(d) 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 (4M) (326 IAC 20-80), are not included in the permit for this proposed revision, since this source is not considered a major source of HAPs.

(e) 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 (4P) (326 IAC 20-81), are not included in the permit for this proposed revision, because this source is not a major source of HAPs and does not perform surface coating of plastic parts or plastic products.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, Subpart QQQQ (4Q) (326 IAC 20-79), are not included in the permit for this proposed revision, since the laminante flooring manufactured at this source are intended for use in truck trailer floors (not buildings) and this source is not a major source of HAPs.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (4R) (326 IAC 20-78), are not included in the permit for this proposed revision, since this source is not considered a major source of HAPs and does not coat metal furniture.

(h) The requirements of 40 CFR Part 63, Subpart HHHHHH (6H) (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources), are not included in the permit for this proposed revision, because 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.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Preserving Area Sources, 40 CFR Part 63, Subpart QQQQQQ (63.11428 through 63.11434), are not included in the permit for this proposed revision, because the source is not a wood preserving operation as defined by 40 CFR 63.11433. Under 40 CFR 63.11433, "wood preserving" means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. In the kilns at this source, no chemicals are impregnated in the wood.

(j) There are no new National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included in the permit for this proposed revision.

Compliance Assurance Monitoring (CAM)

(a) 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.

State Rule Applicability Determination

(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 or Amendment) 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 new units 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.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the potential fugitive particulate emissions at this source are less than 25 tons per year.

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

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

Wood Undercoating Booth (5-013)

(j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The wood undercoating booth (5-013) is subject to the requirements of 326 IAC 6-3-2(d), since it is considered a surface coating operation that uses greater than 5 gallons per day. 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

(k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the wood undercoating booth (5-013) is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the wood undercoating booth (5-013) to less than twenty-five (25) tons per year. Therefore, the wood undercoating booth (5-013) 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 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.

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.

Sealer Booth

(l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the sealer booth, since the sealer booth uses more than five (5) gallons per day of coating and is located anywhere in the state. Pursuant to 326 IAC 6-3-2(d), particulate from the sealer booth, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(m) 326 IAC 8-1-6 (New facilities; general reduction requirements)
The sealer booth is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the sealer booth is less than twenty-five (25) tons per year.

(n) 326 IAC 8-2-9 (Miscellaneous metal and plastic parts coating operations)
The sealer booth is not subject to the requirements of 326 IAC 8-2-9, since the booth does not surface coat metal products. This booth surface coats truck trailer wood laminate floors.

Wood Drying Kins

(o) 326 IAC 4-2 (Incinerators)
The twelve (12) kilns (units 1 through 12) are not subject to the requirements of 326 IAC 4-2-1, because each kiln does not meet the definition of an incinerator as defined in 326 IAC 1-2-34.

(p) 326 IAC 6.5
The twelve (12) kilns (units 1 through 12) are not subject to the requirements of 326 IAC 6.5, since the source is not located in any of the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne. The source is located in White County.

(q) 326 IAC 6.8 (Particulate matter Limitations for Lake County)
The twelve (12) kilns (units 1 through 12) are not subject to the requirements of 326 IAC 6.8, since the source is not located in Lake County. The source is located in White County.

(r) 326 IAC 9-1 (Carbon Monoxide Emission Limits)
The twelve (12) kilns (units 1 through 12) are not subject to the requirements of 326 IAC 9-1, since each unit are not a petroleum refining unit, a ferrous metal smelter, refuse incinerators or refuse burning equipment.

(s) 326 IAC 8-1-6 (New facilities; general reduction requirements)
Each of the twelve (12) kilns (units 1 through 12) is not subject to the requirements of 326 IAC 8-1-6, since each kiln does not have a potential to emit VOC of 25 tons per year or more.

(t) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Each of the twelve (12) kilns (units 1 through 12) is not subject to the requirements of 326 IAC 6-3, since each kiln has potential particulate emissions of less than 0.551 pounds per hour.

Compliance Determination, Monitoring and Testing Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

(a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit	Operating Parameters	Frequency	Range
Wood undercoating booth (5-013)	Filter Inspections	Once per day	Normal/Abnormal
	Overspray	Once per week	
	Stack Overspray Inspections	Once per month	
Waterborne sealer booth (5-014)	Filter Inspections	Once per day	
	Overspray	Once per week	
	Stack Overspray Inspections	Once per month	

These compliance monitoring requirements are necessary to assure that the dry particulate filters are operated properly to assure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Proposed Changes

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

(1) The heading was changed to correct a typographical error in the previous permit

(2) Condition A.1: The phone number and zip code was changed to correct a typographical error in the previous permit.

(3) Condition A.2: The wood undercoating booth unit description was revised to show that the surface coating method is HVLP and the one (1) back up gun was removed.

(4) Sections A.2, D.2, E.1, E.2 and Condition D.2.5: The emission unit descriptons for the boilers 5-001 and 5-002 in Sections A.2, D.2, E.1, E.2 have been revised to include the type of wood that can be combusted. Condition D.2.5 was revised to specify the type of wood that can be combusted in boilers 5-001 and 5-002.

(5) Section A.2: Emission unit descriptons were added for the new unthinned waterborne wood sealer booth (5-014) and the twelve (12) kilns.

(6) Sections A.2 and D.3: The cold cleaner degreaser unit description was revised to clarify the applicable rule citations are 326 IAC 8-3-2 and 326 IAC 8-3-8.

(7) Condition D.1.1: The 326 IAC 6-3 requirements were added for the wood sealer booth (5-014).

(8) Condition D.1.7: Compliance determination requirements was added for the wood sealer booth (5-014).

(9) Condition D.1.8: Requirements for determining compliance with the VOC and HAP limitations contained in Conditions D.1.4 and D.1.5 were added as a new Condition D.1.8.

(10) Condition D.1.10: Compliance monitoring requirements were added to the wood sealer booth (5-014).

(11) Sections D.2 and E.1: The lettering of the emissions unit descriptions were changed to match Section A.2.

(12) Section D.3. the cold cleaner degreaser unit description was updated to match Section A.3.

(13) Condition D.2.1 and the FESOP Quarterly Report Form: The annual wood combustion limit was changed from 20,600 to 15,000 tons per twelve (12) months.

(14) IDEM added the rule citation 326 IAC 2-8-4(1) to the Compliance Determination Requirements subsection title in Sections D.1 and D.2 to clarify the authority of these conditions.

(15) 326 IAC 2-8-12 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The FESOP Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule. In addition, the existing rule cite is being corrected to refer to the FESOP rules.

The permit was revised as follows, with deleted language as ~~strikethrough~~ text and new language as **bold** text:

Rockland Wood Products, LLC
8089 North 200 West
Monon, Indiana ~~47969~~**47959**

***

A.1 General Information [326 IAC 2-8-3(b)]

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

Source Address:	8089 North 200 West, Monon, Indiana ~~47969~~ **47959**
General Source Phone Number:	(215) 253-~~8506~~-**8306**

***

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

***

(c) One (1) wood undercoating booth, identified as 5-013, with four (4) **HVLP** 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.

Note: The Permittee will only combust clean wood in the wood-fired boiler (5-001). 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).

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.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). 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).

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

(f) One (1) unthinned waterborne wood sealer booth, identified as 5-014, approved in 2016 for construction, with a maximum throughput rate of 24.0 gallons of coating per hour, using one (1) HVLP spray applicator, using dry filters as control, and exhausting outside the building.

(g) Twelve (12) kilns, identified as units 1 through 12, constructed before 2003, with a total maximum capacity of 21,900 million square feet of 3/8th inch wood equivalent per year for all twelve units.

***

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

This stationary source also includes the following insignificant activities:

***

(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**-2**, **326 IAC** 8-**3**-8]

***

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

****

(c) One (1) wood undercoating booth, identified as 5-013, with four (4) **HVLP** 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.

(f) One (1) unthinned waterborne wood sealer booth, identified as 5-014, approved in 2016 for construction, with a maximum throughput rate of 24.0 gallons of coating per hour, using one (1) HVLP spray applicator, using dry filters as control, and exhausting outside the building.

****

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

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) **and the wood sealer booth (5-014)** shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

****

Compliance Determination Requirements **[326 IAC 2-8-4(1)]**

D.1.7 Compliance Determination (PM/PM10**/PM2.5**)

In order to ~~ensure~~**assure** compliance with Conditions D.1.1, D.1.2, and D.1.3, particulate from the wood undercoating booth (5-013) **and the wood sealer booth (5-014)** 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 (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.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4(a)(3)(A)][326 IAC 8-1-2(a)]

Compliance with the VOC and HAP limitations contained in Conditions D.1.4 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets or Certified Product Data Sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.**9**~~8~~ Visible Emissions Notations

****

D.1.**10**~~9~~ Broken or Failed Bag Detection

****

D.1.**11**~~10~~ Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the wood undercoating booth (5-013) filters~~.~~ **and wood sealer booth (5-014) 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.

****

D.1.**12**~~11~~ Record Keeping Requirements

(a) To document the compliance status with Condition D.1.**9**~~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.**11**~~10~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

****

D.1.**13**~~12~~ Reporting Requirements

****

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

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

Note: The Permittee will only combust clean wood in the wood-fired boiler (5-001). 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).

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

(~~f~~**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, and exhausting at Stack 5-002a.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

The wood-fired dutch oven boiler, unit 5-002, is subject to NSPS Subpart Dc**, and 40 CFR 63, Subpart JJJJJJ**.

***

***

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~~**15,000** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

***

Compliance Determination Requirements **[326 IAC 2-8-4(1)]**

***

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 in the wood-fired boiler (5-001) and wood-fired dutch oven boiler (5-002). 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).

***

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(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**-2**, **326 IAC** 8**-3**-8]

***

***

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(~~c~~**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, and exhausting at Stack 5-002a.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). 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).

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.)

***

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.

Note: The Permittee will only combust clean wood in the wood-fired boiler (5-001). 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).

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.

Note: The Permittee will only combust clean wood in the wood-fired dutch oven boiler (5-002). 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).

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.)

***

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~~ **15,000** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

***

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) **daytime** 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~~**2-8-12**

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on Janurary 12, 2016. Additional information *was* received on March 10, 2016.

The construction and operation of this proposed *revision* shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 181-36705-00041. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Allen Reimer 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) 2333-0863 or toll free at 1-800-451-6027 extension 3-0863.

(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

Company Name: Rockland Wood Products
Source Address: 8089 North 200 West, Monon, IN 47959
Operating Permit No.: F181-26795-00041
Significant Permit Revision No.: 181-36705-00041
Reviewer: Clinton Mccrowey/Allen Reimer

Uncontrolled Potential to Emit (tons/year) - Part 70 Determination									
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**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	4.26	2.42
Wood Fired Boiler (5-001)	54.14	51.02	44.26	3.38	66.32	2.30	81.21	4.53	2.57
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Degreaser	-	-		-	-	0.49	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	1.6E-02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	1.00	1.00
12 Kilns (new)	3.83	10.95	10.95	-	-	20.30	1.18	1.53	-
Sealer Booth (new)	16.93	16.93	16.93	-	-	3.35	-	1.34	-
Sub-Total (Excludes Emission Units with Integral Devices)	***834.33***	***835.02***	***821.90***	***6.67***	***129.58***	***162.41***	***159.40***	***28.92***	***9.61***
Emission Units with Integral Devices									
Woodworking Shop (5-003)	19.93	19.93	19.93	-	-	-	-	-	-
Total	**854.26**	**854.95**	**841.83**	**6.67**	**129.58**	**162.41**	**159.40**	**28.92**	**9.61**
Fugitive Emissions									
Unpaved Roads	0.48	0.12	0.01	-	-	-	-	-	-

** 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_2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Worst Single HAP (HCl)**
Sub-Total (Excludes Emission Units with Integral Devices)	834.33	835.02	821.90	6.67	129.58	162.41	159.40	28.92	9.61
Emission Units with Integral Devices									
Woodworking Shop (5-003)	1992.74	1992.74	1992.74	-	-	-	-	-	-
Total	**2,827.06**	**2,827.76**	**2,814.64**	**6.67**	**129.58**	**162.41**	**159.40**	**28.92**	**9.61**
Fugitive Emissions									
Unpaved Roads	0.48	0.12	0.01	-	-	-	-	-	-

** 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_2**	**NOx**	**VOC**	**CO**	**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	4.26	2.42
Wood Fired Boiler (5-001)	54.14	51.02	44.26	3.38	66.32	2.30	81.21	4.53	2.57
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
Degreaser	-	-		-	-	0.49	-	-	-
NG Combustion Units	0.02	0.07	0.07	0.01	0.86	0.05	0.72	1.6E-02	-
Other Insignificant Activities	5.00	5.00	5.00	0.10	0.10	10.00	-	1.00	1.00
12 Kilns (new)	3.83	10.95	10.95	-	-	20.30	1.18	1.53	-
Sealer Booth (new)	0.85	0.85	0.85	-	-	3.35	-	1.34	-
Total	**144.24**	**144.94**	**131.81**	**6.67**	**129.58**	**65.12**	**159.40**	**22.68**	**9.61**
Fugitive Emissions									
Unpaved Roads	0.48	0.12	0.01	-	-	-	-	-	-

** 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

Company Name: Rockland Wood Products
Source Address: 8089 North 200 West, Monon, IN 47959
Operating Permit No.: F181-26795-00041
Significant Permit Revision No.: 181-36705-00041
Reviewer: Clinton Mccrowey/Allen Reimer

Potential to Emit after Issuance (tons/year) - Part 70 Determination									
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**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)	48.00	45.24	39.24	3.00	58.80	2.04	72.00	4.02	2.28
Wood Chip Storage Silo (5-004)	1.03	0.60	0.60	-	-	-	-	-	-
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	10.00	-	1.00	1.00
12 Kilns (new)	3.83	10.95	10.95	-	-	20.30	1.18	1.53	-
Sealer Booth (new)**	0.85	0.85	0.85	-	-	3.35	-	1.34	-
Sub-Total (Excludes Emission Units with Integral Devices)	***67.31***	***71.29***	***65.29***	***3.11***	***59.76***	***62.70***	***73.90***	***17.91***	***6.90***
Emission Units with Integral Devices									
Woodworking Shop (5-003)	19.93	19.93	19.93	-	-	-	-	-	-
Total	**87.24**	**91.22**	**85.22**	**3.11**	**59.76**	**62.70**	**73.90**	**17.91**	**6.90**
Fugitive Emissions									
Unpaved Roads	0.48	0.12	0.01	-	-	-	-	-	-

** PM2.5 listed is direct PM2.5*

***Pursuant to 326 IAC 6-3-2(d), the particulate emissions from sealer booth shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the sealer booth to the values shown.*

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 usge limitation for the wood fired boilers effectively limits VOC and CO2e, hourly limitations were not included in the permit.

Potential to Emit after Issuance (tons/year) - PSD									
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Worst Single HAP (HCl)**
Sub-Total (Excludes Emission Units with Integral Devices)	67.31	71.29	65.29	3.11	59.76	62.70	73.90	17.91	6.90
Emission Units with Integral Devices									
Woodworking Shop (5-003)	19.89	19.89	19.89	-	-	-	-	-	-
Total	**87.20**	**91.17**	**85.17**	**3.11**	**59.76**	**62.70**	**73.90**	**17.91**	**6.90**
Fugitive Emissions									
Unpaved Roads	0.48	0.12	0.01	-	-	-	-	-	-

** 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
VOC and Particulate
From Sealer Booth

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

Sealer Booth

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
0715 CL-0001	8.10	84.85%	83.35%	1.50%	83.50%	17.00%	1.000	6.300	151.2	0.74	0.12	0.77	18.37	3.35	16.93	0.71	50%

Potential to Emit Before Control	**0.77**	**18.37**	**3.35**	**16.93**
Dry Filter Control Efficiency				**95.0%**
Potential to Emit After Control				0.85

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Potential to Emit After Control = (Potential to Emit Before Control) * (1 - Control Efficiency)

Appendix A: Emission Calculations
HAP Emission Calculations
From Sealer Booth

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

Sealer Booth

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Diethylene Glycol Monobutyl Ether	Diethylene Glycol Monobutyl Ether Emissions (ton/yr)
0715-CL-0001 waterborne sealer	8.10	0.40000	6.300	1.50%	1.34

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

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

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

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

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

PTE PM/PM10/PM2.5 (After Control) (lbs/hour) = Grain Loading (gr/acf) * Air Flow Rate (acf/min) * 60 min/hour * 1 lb/7000grains
PTE PM/PM10/PM2.5 (After Control) (tons/year) = PTE PM/PM10/PM2.5 (After Control) (lbs/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE PM/PM10/PM2.5 (Before Control) (tons/year) = PTE PM/PM10/PM2.5 (After Control) (tons/year) / (1 - Control Efficiency)
PTE PM/PM10/PM2.5 (Before Control) (lbs/hour) = PTE PM/PM10/PM2.5 (After Control) (lbs/hour) / (1 - Control Efficiency)
PTE PM/PM10/PM2.5 (After Control) (tons/year) = 4.54 lbs/hour * 8760 hours/year * 1 ton/2000 lbs

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

Company Name: Rockland Wood Products
Source Address: 8089 North 200 West, Monon, IN 47959
Operating Permit No.: F181-26795-00041
Significant Permit Revision No.: 181-36705-00041
Reviewer: Clinton Mccrowey/Allen Reimer

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_4Cl Content (%)	Actual Usage Rate NH4Cl (lbs/year)	M.W NH_4Cl	M.W NH_3	PTE NH_3 (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 NH4Cl (lbs/year) = Actual Usage Rate (lbs/year) * NH4Cl (%)
PTE NH3 (tons/year) = Mol. Wt NH3/Mol. Wt NH4Cl * Actual Usage Rate NH4Cl (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 NH4Cl * Actual Usage Rate NH4Cl (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
			Total =	**0.65**

*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
			Total HAPs =	**0.64**

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	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)

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

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
								Worst-case PTE of a single spray gun:	**6.96**	**167.04**	**30.48**	**175.63**	**8.78**	**3.15**
								Worst-case PTE for four(4) spray guns:	**27.84**	**668.16**	**121.94**	**702.52**	**35.13**	**12.61**

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
170,000	10.50	55%	0.29	0.075	65%	95%

VOC (tons/yr)	PM/PM10/PM2.5 (tons/yr)	Total HAP (tons/yr)
24.65	**8.59**	**6.38**

* 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%

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 hour/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)

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

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 condensible 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.

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

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

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 condensible 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.

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

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

Limited Capacity (tons/yr)	15,000
Higher Heating Value of Fuel (Btu/lb)	8000
Converted Capacity in MMBtu/yr	240000.00

	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	48.00	45.24	39.24	3.00	58.80	2.04	72.00

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 condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the
Limited Capacity (MMBtu/yr) = Limited Capacity (tons/yr) 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)	0.48	0.50	0.53	**2.28**	0.23

Potential Emission of Total HAPs (tons/yr)	**4.02**

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-
Limited Emissions (tons/yr) = Limited Capacity (MMBtu/yr) x Emission Factor (lb/MMBtu) x 1 ton/2000lbs
These factors include the five (5) HAPs with the highest AP-42 emission factors.

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

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

Cyclone	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

Baghouse	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

Company Name:	**Rockland Wood Products**
Source Address:	**8089 North 200 West, Monon, IN 47959**
Operating Permit No.:	**F181-26795-00041**
Significant Permit Revision No.:	**181-36705-00041**
Reviewer:	**Clinton Mccrowey/Allen Reimer**

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
12 Kilns

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

Maximum Throughput (SF of 10/8" wood/hour)*	750	(total of 12 kilns)
Maximum Throughput (MSF of 10/8" wood/year)	6,570	(total of 12 kilns)
Equivalent Maximum Throughput (MSF of 3/8" wood/year)*	21,900	(total of 12 kilns)

Potential to Emit

Pollutant	**PM**	**PM10**	**PM2.5**	**VOC**	**CO**	**Total HAPs**	**Worst Single HAP**	
Emission Factor (lb/MSF of 3/8" wood) (indirect heated, heated zone,softwood)**	0.35	1.00	1.00	1.80	0.028	0.89	0.43	(Methanol)
Emission Factor (lb/MSF of 3/8" wood) (indirect heated, cooling zone,softwood)**	0.00	0.00	0.00	0.054	0.043	0.27	0.11	(Methanol)
Potential to emit (tons/year) (softwood)	3.83	10.95	10.95	20.30	0.78	1.16	0.54	(Methanol)
Emission Factor (lb/MSF of 3/8" wood) (indirect heated, heated zone,hardwood)**	0.00	0.00	0.00	0.28	0.0088	0.57	0.45	(Methanol)
Emission Factor (lb/MSF of 3/8" wood) (indirect heated, cooling zone,hardwood)**	0.00	0.00	0.00	0.72	0.099	0.97	0.35	(Methanol)
Potential to emit (tons/year) (hardwood)	0.00	0.00	0.00	10.95	1.18	1.53	0.80	(Methanol)
Worse Case Potential to Emit	**3.83**	**10.95**	**10.95**	**20.30**	**1.18**	**1.53**	**0.80**	**(Methanol)**

Hazardous Air Pollutants (HAPs) (indirect headed, softwood)

Pollutants	Emission Factor (lbs/MSF of 3/8" wood)**		Potential to Emit		Total PTE (ton/yr)
	Heated Zone	Cooling Zone	Heated Zone	Cooling Zone	
Acetaldehyde	0.017	0.0046	0.19	0.05	0.24
Acrolein	0.0013	0.00	0.01	0.00	0.01
Benzene	0.00059	0.00	0.01	0.00	0.01
Formaldehyde	0.014	0.0013	0.15	0.01	0.17
Methanol	**0.039**	**0.01**	**0.43**	**0.11**	**0.54**
Methyl isobutyl ketone	0.0015	0.0054	0.02	0.06	0.08
m,p-Xylene	0.00075	0.0019	0.01	0.02	0.03
o-Xylene	0.00	0.0014	0.00	0.02	0.02
Phenol	0.0034	0.0062	0.04	0.00	0.04
Propionaldehyde	0.0024	0.00	0.03	0.00	0.03
Toluene	0.0011	0.00	0.01	0.00	0.01
		Total HAPs	**0.89**	**0.27**	**1.16**
		Maximum Single HAP (Methanol)	**0.43**	**0.11**	**0.54**

Hazardous Air Pollutants (HAPs) (indirect headed, hardwood)

Pollutants	Emission Factor (lbs/MSF of 3/8" wood)**		Potential to Emit		Total PTE (ton/yr)
	Heated Zone	Cooling Zone	Heated Zone	Cooling Zone	
Acetaldehyde	0.0043	0.032	0.05	0.35	0.40
Formaldehyde	0.0011	0.0065	0.01	0.07	0.08
Methanol	**0.041**	**0.021**	**0.45**	**0.23**	**0.68**
Methyl isobutyl ketone	0.0022	0.029	0.02	0.32	0.34
Phenol	0.0030	0.00	0.03	0.00	0.03
		Total HAPs	**0.57**	**0.97**	**1.53**
		Maximum Single HAP (Methanol)	**0.45**	**0.35**	**0.80**

Notes
SF = square feet, MSF = thousand square feet
*Source stated the height of wood is between 9/8" and 11/8" all calculations assume an average of 10/8" wood
**Emission factors are from AP-42 Chapter 10.5 (Plywood Manufacturing) (published Jan 2002) [emission factor based on 3/8' wood]
Kilns are indirectly heated using steam
Source uses a mixture of hardwood and softwood with no emission control devices.

Methodology
Maximum Throughput (MSF of 10/8" wood/year) = Maximum Throughput (SF of 10/8" wood/hour) x (8760 hours/year) / (1000 SF / MSF)
Equivalent Maximum Throughput (MSF of 3/8" wood/year) = Maximum Throughput (SF of 10/8" wood/hour) x (10/3 conversion factor from 10/8" wood to 3/8" wood)
Potential to Emit (tons/yr) = Emission Factor (lbs/MSF of 3/8" wood) x (Equivalent Maximum Throughput (MSF of 3/8" wood/year)) x (ton/2000 lbs)

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

Company Name: **Rockland Wood Products**
Source Address: **8089 North 200 West, Monon, IN 47959**
Operating Permit No.: **F181-26795-00041**
Significant Permit Revision No.: **181-36705-00041**
Reviewer: **Clinton Mccrowey/Allen Reimer**

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

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	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**
					Total HAPs	**0.02**
					Worst HAP	**0.02**

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.

Appendix A: Emissions Calculations
Fugitive Emissions From Unpaved Roads

Company Name: Rockland Wood Products
Source Address: 8089 North 200 West, Monon, IN 47959
Operating Permit No.: F181-26795-00041
Significant Permit Revision No.: 181-36705-00041
Reviewer: Clinton Mccrowey/Allen Reimer

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
		Totals	**20.0**		**560.0**			**0.6**	**207.4**

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

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	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, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	7.05	1.80	0.18	lb/mile
Mitigated Emission Factor, Eext =	4.64	1.18	0.12	lb/mile

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)
Vehicle (entering plant) (one-way trip)	0.37	0.09	0.01	0.24	0.06	0.01
Vehicle (leaving plant) (one-way trip)	0.37	0.09	0.01	0.24	0.06	0.01
Totals	**0.73**	**0.19**	**0.02**	**0.48**	**0.12**	**0.01**

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
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

April 19, 2016

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

Re: Public Notice
Rockland Wood Products
Permit Level: FESOP - Significant Permit Revision
Permit Number: 181 - 36705 - 00041

Dear Matthew Clark:

Enclosed is a copy of your draft 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 April 23, 2016. 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 and Township Public Library, 427 N. Market St in Monon IN. 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 Allen Reimer, 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 3-0863 or dial (317) 233-0863.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 19, 2016

Herald Journal
Attn: Classifieds
114 South Main Street
Monticello, Indiana 47960

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Rockland Wood Products, 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 April 23, 2016.

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 Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: FESOP - Significant Permit Revision
Permit Number: 181 - 36705 - 00041

Enclosure
PN Newspaper.dot 6/13/2013

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

April 19, 2016

To: Monon Town and Township Public Library 427 N. Market St Monon IN

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
Permit Number: 181 - 36705 - 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 2/17/2016

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

April 19, 2016
Rockland Wood Products
181 - 36705 - 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. 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 2/17/2016

Mail Code 61-53

IDEM Staff	LPOGOST 4/19/2016 Rockland Wood Products 181 - 36705 - 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: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing 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)*									
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