



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

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Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
the Renewal of a Federally Enforceable State Operating Permit (FESOP)

for Westwood Lumber Sales, Inc. in Allen County

FESOP Renewal No.: F003-36734-00306

The Indiana Department of Environmental Management (IDEM) has received an application from Westwood Lumber Sales, Inc., located at 1407 Bandalier Rd., New Haven, Indiana 46774, for a new source review and renewal of its FESOP issued on November 8, 2006. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Westwood Lumber Sales Inc. to make certain changes at its existing source. Westwood Lumber Sales, Inc. has applied to renew its operating permit and to construct and operate new emission units.

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 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 surface coating stain machine has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft FESOP Renewal and NSR 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:

Allen County Public Library
900 Library Plaza
Fort Wayne, IN 46802

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 F003-36734-00306 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@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 Brian Wright of my staff at the above address.



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



Indiana Department of Environmental Management

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New Source Review and Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Westwood Lumber Sales, Inc.
1407 Bandelier Rd.
New Haven, Indiana 46774

(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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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.

Table with permit details: Operation Permit No. F003-36734-00306, Issued by: Nathan C. Bell, Section Chief, Permits Branch, Office of Air Quality, Issuance Date, Expiration Date.

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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 millwork and cedar siding pre-staining operation.

Source Address:	1407 Bandelier Rd., New Haven, Indiana 46774
General Source Phone Number:	260-749-4143
SIC Code:	2431 (Millwork)
County Location:	Allen
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) Two (2) surface coating stain machines, identified as #1 and #2, constructed in 2000, each with a maximum capacity of 5 gallons per hour of coating, and using roll coating for application.
- (b) One (1) surface coating stain machine, identified as #3, constructed in 2012, with a maximum capacity of 5 gallons per hour of coating, and using roll coating for application.
- (c) Millwork facility, constructed in 2000, modified in 2012, with a maximum throughput of 13 tons per hour, with a baghouse for particulate control, consisting of:
 - (1) Two (2) resaws and;
 - (2) Five (5) moulders.

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) Three (3) natural gas-fired heaters, constructed in 2000, each with a maximum heat input capacity of 0.1 MMBtu/hr.
- (b) Two (2) natural gas-fired heaters, constructed in 2012, each with a maximum heat input capacity of 0.125 MMBtu/hr.

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) to renew 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, F003-36734-00306, 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. All 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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

B.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 F003-36734-00306 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 two hundred fifty (250) 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(1)][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) 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) Two (2) surface coating stain machines, identified as #1 and #2, constructed in 2000, each with a maximum capacity of 5 gallons per hour of coating, and using roll coating for application.
- (b) One (1) surface coating stain machine, identified as #3, constructed in 2012, with a maximum capacity of 5 gallons per hour of coating, and using roll coating for application.

(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 FESOP Limitations [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the total VOC input to each of the surface coating stain machines (#1, 2, and 3), including coatings, dilution solvents, and cleaning solvents, shall not exceed 24 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

D.1.2 VOC Limit [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the total VOC input to each of the surface coating stain machines (#1, 2, and 3), including coatings, dilution solvents, and cleaning solvents, shall not exceed 24 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

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

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC input limits contained in Conditions D.1.1 and D.1.2 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 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.

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

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC input and content limits established in Conditions D.1.1, D.1.2, and D.1.3.

- (1) The VOC content of each coating material and solvent used less water.

- (2) The amount of coating material and solvent used each month for the surface coating stain machines (#1, 2, and 3).
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC input for each month and each compliance period for the surface coating stain machines (#1, 2, and 3).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.5 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their 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 reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Millwork facility, constructed in 2000, modified in 2012, with a maximum throughput of 13 tons per hour, with a baghouse for particulate control, consisting of:
- (1) Two (2) resaws and;
 - (2) Five (5) moulders.

(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.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from particulate matter (PM) emissions from the woodworking operation shall not exceed 22.86 pounds per hour when operating at a process weight rate of 13 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any corresponding 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.2.3 Particulate Control

In order to comply with Condition D.2.1, the baghouse for particulate control shall be in operation and control emissions from the millwork facility at all times that the millwork facility is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

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

Source Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, Indiana 46774
FESOP Permit No.: F003-36734-00306

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:

**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: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, Indiana 46774
FESOP Permit No.: F003-36734-00306

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, Indiana 46774
FESOP Permit No.: F003-36734-00306
Facility: Surface Coating Stain Machine #1
Parameter: VOC
Limit: The total VOC input to the surface coating stain machine (#1), including coatings, dilution solvents, and cleaning solvents, shall not exceed 24 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, Indiana 46774
FESOP Permit No.: F003-36734-00306
Facility: Surface Coating Stain Machine #2
Parameter: VOC
Limit: The total VOC input to the surface coating stain machine (#2), including coatings, dilution solvents, and cleaning solvents, shall not exceed 24 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, Indiana 46774
FESOP Permit No.: F003-36734-00306
Facility: Surface Coating Stain Machine #3
Parameter: VOC
Limit: The total VOC input to the surface coating stain machine (#3), including coatings, dilution solvents, and cleaning solvents, shall not exceed 24 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 AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, Indiana 46774
FESOP Permit No.: F003-36734-00306

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a New Source Review and
Federally Enforceable State Operating Permit Renewal**

Source Background and Description

Source Name:	Westwood Lumber Sales, Inc.
Source Location:	1407 Bandelier Rd., New Haven, IN 46774
County:	Allen
SIC Code:	2431 (Millwork)
Permit Renewal No.:	F003-36734-00306
Permit Reviewer:	Brian Wright

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Westwood Lumber Sales, Inc. relating to the operation of a stationary millwork and cedar siding pre-staining operation. On January 20, 2016, Westwood Lumber Sales, Inc. submitted an application to the OAQ requesting to renew its operating permit and to construct and operate new emission units. Westwood Lumber Sales, Inc. was issued its first FESOP Renewal F003-19785-00306 on November 8, 2006.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Two (2) surface coating stain machines, identified as #1 and #2, constructed in 2000, each with a maximum capacity of 5 gallons per hour of coating, and using roll coating for application.
- (b) Millwork facility, constructed in 2000, modified in 2012, with a maximum throughput of 13 tons per hour, with a baghouse for particulate control, consisting of:
 - (1) Two (2) resaws and;
 - (2) Five (5) moulders.

Emission Units and Pollution Control Equipment Constructed and Operated without a Permit

The source also consists of the following emission units that were constructed and/or are operating without a permit:

- (a) One (1) surface coating stain machine, identified as #3, constructed in 2012, with a maximum capacity of 5 gallons per hour of coating, and using roll coating for application.
- (b) Two (2) natural gas-fired heaters, constructed in 2012, each with a maximum heat input capacity of 0.125 MMBtu/hr.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Three (3) natural gas-fired heaters, constructed in 2000, each with a maximum heat input capacity of 0.1 MMBtu/hr.

Existing Approvals

Since the issuance of the FESOP Renewal F003-19785-00306 on November 8, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 003-25694-00306 issued on January 1, 2008.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Air Pollution Control Justification as an Integral Part of the Process

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and Prevention of Significant Deterioration (PSD).

Enforcement Issue

IDEM is aware that equipment has been constructed and prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit". IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction and operating permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – New Source Review

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 surface coating stain machine #3 and the two (2) natural gas-fired heaters. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of New Equipment (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Machine 3	0.00	0.00	0.00	-	-	79.46	-	0.56	0.56 Ethylene Glycol
Natural gas-fired heaters	0.002	0.01	0.01	0.001	0.11	0.01	0.09	0.002	0.002 Hexane
Total PTE of New Equipment	0.002	0.01	0.01	0.001	0.11	79.47	0.09	0.56	0.56 Ethylene Glycol

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), construction and operation of the surface coating stain machine #3 and the two (2) natural gas-fired heaters requires a FESOP Significant Permit Revision (New Source

Review permit), because the new equipment has potential to emit greater than or equal to twenty-five (25) tons per year of Volatile Organic Compounds (VOC).

County Attainment Status

The source is located in Allen 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.

¹Unclassifiable 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. Allen 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}**
 Allen County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Allen 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	5.64
PM10	5.65
PM2.5	5.65
SO2	0.00
NOx	0.24

Unrestricted Potential Emissions	
Pollutant	Tons/year
VOC	238.38
CO	0.20
Single HAP	0.56 Ethylene Glycol
Total HAP	0.57

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

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Machine 1	0.00	0.00	0.00	0.00	0.00	24	0.00	0.19	0.19 Ethylene Glycol
Machine 2	0.00	0.00	0.00	0.00	0.00	24	0.00	0.19	0.19 Ethylene Glycol
Machine 3	0.00	0.00	0.00	0.00	0.00	24	0.00	0.19	0.19 Ethylene Glycol
Woodworking***	5.63	5.63	5.63	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas-Fired Heaters	0.00	0.02	0.02	0.001	0.24	0.01	0.20	0.004	0.004 Hexane
Total PTE of Entire Source	5.64	5.65	5.65	0.001	0.24	72.01	0.20	0.57	0.56 Ethylene Glycol

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.
 ***PTE of the Woodworking Operation is after integral controls

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAP emissions, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the total VOC input to each of the surface coating stain machines (#1, 2, and 3), including coatings, dilution solvents, and cleaning solvents, shall not exceed 24 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

(b) GHGs

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

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

(c) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (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).

Federal Rule Applicability

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.

NSPS

- (b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are still not included in the permit for the natural gas-fired heaters since these units are not steam generating units as defined by 40 CFR 60.41c.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

NESHAP

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), are not included in this permit since the source does not produce wood furniture. The source produces wood siding.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, Subpart DDDD, are still not included in the permit for this facility, since the cedar siding produced by the facility is not plywood or composite wood products as defined by 40 CFR 63.2292, and the facility is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products, Subpart MMMM (326 IAC 20-80), are still not included in the permit for this facility, since the source does not coat metal and is not a major source of HAPs. The source only coats wood products.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plastic Parts and Products, Subpart PPPP (326 IAC 20-81), are still not included in the permit for this facility, since the source does not coat plastic and is not a major source of HAPs. The source only coats wood products.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, Subpart QQQQ (326 IAC 20-79), are still not included in the permit for this facility, since although it coats wood building products, it is not a major source of HAPs.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit, since the facility is not a major source of HAP emissions and the natural gas-fired heaters are not process heaters as defined by 40 CFR 63.7575.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJ, are not included in this permit, since the natural gas-fired heaters are not process heaters as defined by 40 CFR 63.11237.

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

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source is subject to 326 IAC 1-5-2.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

PSD applicability is discussed under the PTE After Issuance section above.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE After Issuance section above.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions less than 25 tons per year.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Surface Coating

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(6), the surface coating stain Machines (#1, 2, and 3) are not subject to the requirements of 326 IAC 6-3-2 since the machines use roll coating.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The unlimited/uncontrolled potential to emit VOC from each of the surface coating stain Machines (#1, 2, and 3) is greater than 25 tons per year. In order to render the requirements of 326 IAC 8-1-6 not applicable to the surface coating stain Machines (#1, 2, and 3), the VOC input to each of the surface coating stain Machines (#1, 2, and 3), including coatings, dilution solvents, and cleaning solvents, shall not exceed 24 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

326 IAC 8-2-10 (Flat wood panes; manufacturing operations)

The surface coating stain Machines (#1, 2, and 3) are not subject to the requirements of 326 IAC 8-2-10, since they are part of a wood exterior siding manufacturing operation that is not located in Lake or Porter County. The source is located in Allen County.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

The surface coating stain Machines (#1, 2, and 3) are not subject to the requirements of 326 IAC 8-2-12, since the machines do not coat wood furniture. The source coats wood siding.

326 IAC 8-11 (Wood furniture coatings)

The surface coating stain Machines (#1, 2, and 3) are not subject to the requirements of 326 IAC 8-11, since the machines do not coat wood furniture and are not located in Lake, Porter, Clark, or Floyd County.

Woodworking

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), the woodworking operation is subject to the requirements of 326 IAC 6-3, if the potential to emit particulate matter after integral woodworking controls is greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the woodworking operation shall not exceed 22.86 pounds per hour when operating at a process weight rate of 13 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

In order to comply with this limit, the baghouse for particulate control shall be in operation at all times when any of the woodworking facilities are in operation.

Natural Gas-Fired Heaters

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)

The natural gas-fired heaters are not subject to the requirements of 326 IAC 6-2 since they are not sources of indirect heat.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The natural gas-fired heaters are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the natural gas-fired heaters are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the natural gas-fired heaters is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

There are no applicable compliance determination or monitoring requirements included in this permit.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal and New Source Review be approved. This recommendation is based on the following facts and conditions:

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 January 20, 2016.

Conclusion

The operation of this stationary millwork and cedar siding pre-staining operation shall be subject to the conditions of the attached FESOP Renewal and New Source Review No. F003-36734-00306.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (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
Summary**

Company Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, IN 46774
FESOP Renewal No.: F003-36734-00306
Reviewer: Brian Wright

Uncontrolled/Unlimited Emissions Before Integral Woodworking Controls

Process	Potential to Emit (tons/year)								Single HAP	
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs		
Machine 1	0.00	0.00	0.00	0.00	0.00	79.46	0.00	0.19	0.19	Ethylene Glycol
Machine 2	0.00	0.00	0.00	0.00	0.00	79.46	0.00	0.19	0.19	Ethylene Glycol
Machine 3	0.00	0.00	0.00	0.00	0.00	79.46	0.00	0.19	0.19	Ethylene Glycol
Woodworking	563.14	563.14	563.14	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas-Fired Heaters	0.00	0.02	0.02	0.001	0.24	0.01	0.20	0.004	0.004	Hexane
Total	563.15	563.16	563.16	0.001	0.24	238.38	0.20	0.57	0.56	Ethylene Glycol

Uncontrolled/Unlimited Emissions After Integral Woodworking Controls

Process	Potential to Emit (tons/year)								Single HAP	
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs		
Machine 1	0.00	0.00	0.00	0.00	0.00	79.46	0.00	0.19	0.19	Ethylene Glycol
Machine 2	0.00	0.00	0.00	0.00	0.00	79.46	0.00	0.19	0.19	Ethylene Glycol
Machine 3	0.00	0.00	0.00	0.00	0.00	79.46	0.00	0.19	0.19	Ethylene Glycol
Woodworking	5.63	5.63	5.63	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas-Fired Heaters	0.00	0.02	0.02	0.001	0.24	0.01	0.20	0.004	0.004	Hexane
Total	5.64	5.65	5.65	0.001	0.24	238.38	0.20	0.57		

Uncontrolled/Limited Emissions After Integral Woodworking Controls

Process	Potential to Emit (tons/year)								Single HAP	
	PM	PM10	PM2.5	SO2	NOx	VOC*	CO	Total HAPs		
Machine 1	0.00	0.00	0.00	0.00	0.00	24.00	0.00	0.19	0.19	Ethylene Glycol
Machine 2	0.00	0.00	0.00	0.00	0.00	24.00	0.00	0.19	0.19	Ethylene Glycol
Machine 3	0.00	0.00	0.00	0.00	0.00	24.00	0.00	0.19	0.19	Ethylene Glycol
Woodworking	5.63	5.63	5.63	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas-Fired Heaters	0.00	0.02	0.02	0.001	0.24	0.01	0.20	0.004	0.004	Hexane
Total	5.64	5.65	5.65	0.001	0.24	72.01	0.20	0.57		

*Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) and 326 IAC 2-7 (Part 70 Permits) not applicable, total VOC input to each of the paint Machines shall not exceed 24 tons per twelve month consecutive period with compliance determined at the end of each month.

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and Prevention of Significant Deterioration (PSD).

**Appendix A: Emissions Calculations
Surface Coating VOC and PM**

Company Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, IN 46774
FESOP Renewal No.: F003-36734-00306
Reviewer: Brian Wright

VOC and Particulate

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water and Exempt Solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/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			
Machine 1																					
Maximum Acrylic/Oil - S/T Cedar	8.51	82.00%	72.6%	9.4%	70.6%	20.00%	0.67	7.50	5.0	120.6	2.72	0.80	4.02	96.58	17.63	0.00	4.00	100%			
Wood Guardian Gloss Urethane Finish	7.50	50.00%	1.9%	48.1%	1.9%	45.00%	0.67	7.50	5.0	120.6	3.68	3.61	18.14	435.37	79.46	0.00	8.02	100%			
Superpaint Machine Finish Alkyd Primer	11.98	57.70%	34.2%	23.5%	30.9%	56.00%	0.67	7.50	5.0	120.6	4.08	2.82	14.17	340.10	62.07	0.00	5.04	100%			
TWP-1501 Cedartone -1	7.46	39.14%	0.0%	39.1%	30.9%	56.00%	0.67	7.50	5.0	120.6	4.23	2.92	14.68	352.22	64.28	0.00	5.22	100%			
Machine 1 Total (Worst Case Coating)													18.14	435.37	79.46	0.00					
Machine 2																					
Maximum Acrylic/Oil - S/T Cedar	8.51	82.00%	72.6%	9.4%	70.6%	20.00%	0.67	7.50	5.0	120.6	2.72	0.80	4.02	96.58	17.63	0.00	4.00	100%			
Wood Guardian Gloss Urethane Finish	7.50	50.00%	1.9%	48.1%	1.9%	45.00%	0.67	7.50	5.0	120.6	3.68	3.61	18.14	435.37	79.46	0.00	8.02	100%			
Superpaint Machine Finish Alkyd Primer	11.98	57.70%	34.2%	23.5%	30.9%	56.00%	0.67	7.50	5.0	120.6	4.08	2.82	14.17	340.10	62.07	0.00	5.04	100%			
TWP-1501 Cedartone -1	7.46	39.14%	0.0%	39.1%	30.9%	56.00%	0.67	7.50	5.0	120.6	4.23	2.92	14.68	352.22	64.28	0.00	5.22	100%			
Machine 2 Total (Worst Case Coating)													18.14	435.37	79.46	0.00					
Machine 3																					
Maximum Acrylic/Oil - S/T Cedar	8.51	82.00%	72.6%	9.4%	70.6%	20.00%	0.67	7.50	5.0	120.6	2.72	0.80	4.02	96.58	17.63	0.00	4.00	100%			
Wood Guardian Gloss Urethane Finish	7.50	50.00%	1.9%	48.1%	1.9%	45.00%	0.67	7.50	5.0	120.6	3.68	3.61	18.14	435.37	79.46	0.00	8.02	100%			
Superpaint Machine Finish Alkyd Primer	11.98	57.70%	34.2%	23.5%	30.9%	56.00%	0.67	7.50	5.0	120.6	4.08	2.82	14.17	340.10	62.07	0.00	5.04	100%			
TWP-1501 Cedartone -1	7.46	39.14%	0.0%	39.1%	30.9%	56.00%	0.67	7.50	5.0	120.6	4.23	2.92	14.68	352.22	64.28	0.00	5.22	100%			
Machine 3 Total (Worst Case Coating)													18.14	435.37	79.46	0.00					
Total Potential to Emit (tons/year)													54.42	1306.12	238.37	0.00					

METHODOLOGY

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

**Appendix A: Emissions Calculations
Surface Coating VOC and PM**

**Company Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, IN 46774
FESOP Renewal No.: F003-36734-00306
Reviewer: Brian Wright**

Hazardous Air Pollutants (HAPs)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylene Glycol	Weight % Cobalt	Ethylene Glycol Emissions (ton/yr)	Cobalt Emissions (ton/yr)	Combined HAPs (tons/year)
Machine 1								
Maximum Acrylic/Oil - S/T Cedar	8.51	0.67	0.75	1.00%	0.00%	0.19	0.00	0.19
Wood Guardian Gloss Urethane Finish	7.50	0.67	0.75	0.00%	0.00%	0.00	0.00	0.00
Superpaint Machine Finish Alkyd Primer	11.98	0.67	0.75	0.00%	0.10%	0.00	0.03	0.03
TWP-1501 Cedartone -1	7.46	0.67	0.75	0.00%	0.00%	0.00	0.00	0.00
Machine 1 Total (Worst Case Coating)						0.19	0.03	0.19
Machine 2								
Maximum Acrylic/Oil - S/T Cedar	8.51	0.67	0.75	1.00%	0.00%	0.19	0.00	0.19
Wood Guardian Gloss Urethane Finish	7.50	0.67	0.75	0.00%	0.00%	0.00	0.00	0.00
Superpaint Machine Finish Alkyd Primer	11.98	0.67	0.75	0.00%	0.10%	0.00	0.03	0.03
TWP-1501 Cedartone -1	7.46	0.67	0.75	0.00%	0.00%	0.00	0.00	0.00
Machine 2 Total (Worst Case Coating)						0.19	0.03	0.19
Machine 3								
Maximum Acrylic/Oil - S/T Cedar	8.51	0.67	0.75	1.00%	0.00%	0.19	0.00	0.19
Wood Guardian Gloss Urethane Finish	7.50	0.67	0.75	0.00%	0.00%	0.00	0.00	0.00
Superpaint Machine Finish Alkyd Primer	11.98	0.67	0.75	0.00%	0.10%	0.00	0.03	0.03
TWP-1501 Cedartone -1	7.46	0.67	0.75	0.00%	0.00%	0.00	0.00	0.00
Machine 3 Total (Worst Case Coating)						0.19	0.03	0.19
Total						0.56	0.08	0.56

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations
Woodworking Operations
Dust Collector (WWDC1)**

**Company Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, IN 46774
FESOP Renewal No.: F003-36734-00306
Reviewer: Brian Wright**

Uncontrolled Potential Emissions (tons/year)							
DUST COLLECTOR							
Process	No. of Units	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
WWDC1	1	50,000	0.003	40.0	1,250.00	99.00%	563.14
Total Emissions Based on Rated Capacity at 8,760 Hours/Year (tons/year) - Equipment Connected to Control Devices							563.14
Total Emissions Based on Rated Capacity (lb/hr) - Equipment Connected to Control Devices							128.57
Controlled Potential Emissions (tons/year)*							
DUST COLLECTOR							
Process	No. of Units	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
WWDC1	1	50,000	0.003000	40.0	1,250.00	99.00%	5.63
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (tons/year)							5.63
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (lb/hr)							1.29
<p>*In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and Prevention of Significant Deterioration (PSD)</p>							
Methodology:							
Potential Emission (uncontrolled):							
Potential Emission(tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft ²) * Filter Area (ft ²) * 1 lb/7,000 grains * 60 min/hr							
Potential Emission (controlled):							
Potential Emission (tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft ²) * Filter Area (ft ²) * 1 lb/7,000 grains * 60							

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

Company Name: Westwood Lumber Sales, Inc.
Source Address: 1407 Bandelier Rd., New Haven, IN 46774
FESOP Renewal No.: F003-36734-00306
Reviewer: Brian Wright

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.55	1020	4.7

# of heaters	MMBtu/hr each	Total
3	0.1	0.3
2	0.125	0.25
Total		0.55

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.004	0.02	0.02	0.001	**see below	0.01	0.20

*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					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
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	5.0E-06	2.8E-06	1.8E-04	4.25E-03	8.0E-06	4.4E-03

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
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	1.2E-06	2.6E-06	3.3E-06	9.0E-07	5.0E-06	1.3E-05

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.

Total HAPs	4.5E-03
Worst HAP	4.3E-03



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

Carol S. Comer
Commissioner

April 22, 2016

Jay Weller
Westwood Lumber Sales
PO Box 526
New Haven, IN 46774

Re: Public Notice
Westwood Lumber Sales
Permit Level: FESOP - Renewal / New Equipment
Permit Number: 003 - 36734 - 00306

Dear Jay Weller:

Enclosed is a copy of your draft FESOP - Renewal / New Equipment, 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 Fort Wayne Journal Gazette in Fort Wayne, Indiana publish the abbreviated version of the public notice no later than April 27, 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 Allen County Public Library, 900 Library Plaza, P.O. Box 2270 in Fort Wayne 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 Brian Wright, 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 4-6544 or dial (317) 234-6544.

Sincerely,

Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 22, 2016

Fort Wayne Journal Gazette
Attn: Classifieds
600 W. Main Street, PO Box 100
Fort Wayne, Indiana 46801

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Westwood Lumber Sales, Allen 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 27, 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 - Renewal / New Equipment
Permit Number: 003 - 36734 - 00306

Enclosure
PN Newspaper.dot 6/13/2013



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

Carol S. Comer
Commissioner

April 22, 2016

To: Allen County Public Library 900 Library Plaza, P.O. Box 2270 Fort Wayne 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: Westwood Lumber Sales
Permit Number: 003 - 36734 - 00306

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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Notice of Public Comment

April 22, 2016
Westwood Lumber Sales
003 - 36734 - 00306

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 4/22/2016 Westwood Lumber Sales, Inc 003 - 36734 - 00306 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		Jay Weller Westwood Lumber Sales, Inc PO Box 526 New Haven IN 46774 (Source CAATS)										
2		Cole Richeson Secretary/Treasurer Westwood Lumber Sales, Inc PO Box 526 New Haven IN 46774 (RO CAATS)										
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
5		Allen County Public Library 900 Library Plaza, P.O. Box 2270 Fort Wayne IN 46802 (Library)										
6		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
7		New Haven City Council and Mayors Office P.O. Box 570 New Haven IN 46774 (Local Official)										
8		Tim & Stacie Wallace 6402 CR 51 Saint Joe IN 46785-9605 (Affected Party)										
9		Robert & Denise Glasser 1134 Hartzell St New Haven IN 46774 (Affected Party)										
10		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
11		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)										
12		Cheryl Wise Wilcox Environmental Engineering 5757 W 74th St Indianapolis IN 46278-1755 (Consultant)										
13												
14												
15												

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