



Indiana Department of Environmental Management

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Preliminary Findings Regarding a Significant Modification and Renewal of a Part 70 Operating Permit

for Cole Hardwood, Inc. in Cass County

Significant Source Modification No.: 017-37058-00028
Part 70 Operating Permit Renewal No.: T017-35999-00028

The Indiana Department of Environmental Management (IDEM) has received an application from Cole Hardwood, Inc., located at 1611 West Market Street, Logansport, IN 46947, for a significant source modification and renewal of its Part 70 Operating Permit, issued on April 26, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Cole Hardwood, Inc. to make certain changes at its existing source. Cole Hardwood, Inc. has applied to add one (1) wood hog grinder with associated material conveying and handling operations, twenty (20) wood-drying kilns, and a number of insignificant activities to the permit. Finally, Cole Hardwood, Inc. has indicated a change in operation, where the existing surface coatings have been replaced with low VOC / HAP coatings.

The applicant has constructed and operated new equipment that emits 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. 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 new equipment has been constructed and operated, and operational changes made prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft Significant Source Modification and Part 70 Operating Permit Renewal contain 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:

Logansport-Cass County Public Library
616 East Broadway
Logansport, IN 46947-3155

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 T017-35999-00028 and SSM 017-37058-00028 in all correspondence.

Comments should be sent to:

Hannah L. Desrosiers
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-9327
Or dial directly: (317) 233-9327
Fax: (317)-232-6749 attn: Hannah Desrosiers
E-mail: hdesrosi@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 Ms. Hannah Desrosiers, of my staff, at the above address.



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



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Mr. Patrick Rentschler
Cole Hardwood, Inc.
P.O. Box 568
Logansport, IN 46947

Re: 017-37058-00028
Significant Source Modification

Dear Mr. Patrick Rentschler:

Cole Hardwood, Inc. was issued Part 70 Operating Permit Renewal No. T017-29073-00028 on April 26, 2011 for a stationary hardwood concentration yard and wholesale operation, and wood furniture manufacturing and surface coating facility, located at 1611 West Market Street, Logansport, IN 46947. An application to modify the source was received on April 8, 2016. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) One (1) IDI Wood Hog grinder, identified as IDIHOG2, constructed in 2005 and permitted in 2016, having a maximum throughput capacity of 46.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse, identified as BH-4, and exhausting outside the building.
- (b) Ground wood conveying and storage operations, consisting of:
 - (1) One (1) pneumatic conveying system, identified as IDIGWPCS2, constructed in 2005 and permitted in 2016, for transport of ground wood from grinding machine IDIHOG2 to storage silo IDI-S2, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, and exhausting to storage silo IDI-S2 baghouse (IDIBH2) stack IDIBH-S2; and
 - (2) One (1) ground wood storage silo, identified as IDI-S2, constructed in 1983, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control, identified as IDIBH2, and exhausting to stack IDIBH-S2.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

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- Effective Date of the Permit
3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- Commenced Construction
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

- Approval to Construct
6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

For the purposes of this permitting action, the Significant Permit Modification has been combined with the current Part 70 Operating Permit Renewal. Therefore, operation is not approved until the Part 70 Operating Permit Renewal has been issued.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Ms. Hannah Desrosiers of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Hannah Desrosiers or extension 3-9327 or dial (317) 233-9327.

Sincerely,

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

Attachments: Significant Source Modification and Technical Support Document

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



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Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

Cole Hardwood, Inc.
1611 West Market Street
Logansport, Indiana 46947

(herein known as the Permittee) is hereby authorized to construct subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

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 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 017-37058-00028	
Issued by:	Issuance Date:
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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National Emissions Standards for Hazardous Air Pollutants for Source Category Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC].....Attachment C

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary hardwood concentration yard and wholesale operation, and hardwood dimensions, panels, moldings, and cabinet components manufacturing and surface coating facility.

Source Address:	1611 West Market Street, Logansport, Indiana 46947
General Source Phone Number:	(574) 753-3151
SIC Code:	Cole Hardwood, Inc.: 5031 (Lumber, Millwork, and Wood Panels) 2421 (Sawmills and Planing Mills, General); Indiana Dimension, Inc.: 2434 (Wood Kitchen Cabinets); and 2431 (Millwork);
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(14)]**

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

- (a) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as the MILL, constructed in 1998, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, equipped with one (1) baghouse (BH-1) determined integral to the process, exhausting through Stack DC1.
- (b) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as IDI, constructed in 1990, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, equipped with six (6) baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, and BH-6) determined integral to the process, exhausting through stacks IDI01, IDI02, and IDI03.
- (c) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as RETAIL, constructed in 1999, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, equipped with one (1) baghouse (BH-7) determined integral to the process, exhausting into the HOG building.
- (d) One (1) Cole Hardwood Wood Hog grinder, identified as CH-HOG, constructed in 1983 and permitted in 2000, having a maximum throughput capacity of 8.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-8), exhausting outside the building.
- (e) One (1) IDI Wood Hog grinder, identified as IDI-HOG1, constructed in 1990 and permitted in 2000, having a maximum throughput capacity of 46.4 tons of wood scrap per hour,

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controlling particulate emissions using one (1) baghouse (BH-2), exhausting outside the building.

- (f) One (1) IDI Wood Hog grinder, identified as IDI-HOG2, constructed in 2005 and permitted in 2016, having a maximum throughput capacity of 92.8 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-4) and exhausting outside the building.
- (g) Ground wood conveying and storage operations, consisting of:
 - (1) One (1) pneumatic conveying system, identified as CH-GWPCS, constructed in 1983 and permitted in 2000, for transport of ground wood from grinding machine CH-HOG to storage silo CH-SILO1, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo CH-SILO1 baghouse (CH-BH) stack CH-BH-S1.
 - (2) One (1) ground wood storage silo, identified as CH-SILO1, constructed in 1983, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, and a total storage capacity of 15,724 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (CH-BH), exhausting to stack CH-BH-S1.
 - (3) One (1) ground wood auger conveying system, identified as CH-GWACS, constructed in 1983 and permitted in 2000, for transport of ground wood from ground wood storage silo CH-SILO1 to the BOILER1 and BOILER3 feed system, with a bottlenecked throughput capacity of 1.78 tons of ground wood per hour, uncontrolled and exhausting outside the building.
 - (4) One (1) pneumatic conveying system, identified as IDI-GWPCS1, constructed in 1990 and permitted in 2000, for transport of ground wood from grinding machine IDI-HOG1 to storage silo IDI-SILO1, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO1 baghouse (IDI-BH1) stack IDI-BH-S1.
 - (5) One (1) ground wood storage silo, identified as IDI-SILO1, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH1), exhausting to stack IDI-BH-S1.
 - (6) One (1) pneumatic conveying system, identified as IDI-GWPCS2, constructed in 2005 and permitted in 2016, for transport of ground wood from grinding machine IDI-HOG2 to storage silo IDI-SILO2, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO2 baghouse (IDI-BH2) stack IDI-BH-S2.
 - (7) One (1) ground wood storage silo, identified as IDI-SILO2, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH2), exhausting to stack IDI-BH-S2.
 - (8) One (1) ground wood auger conveying system, identified as IDI-GWACS, constructed in 1990 and permitted in 2000, for transport of ground wood from ground wood storage silo IDI-SILO2 to the BOILER2 feed system, with a bottlenecked throughput capacity of 1.26 tons of ground wood per hour, uncontrolled and exhausting outside the building; and

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- (9) Sawdust loading, identified as SLOAD, constructed in 1990 and permitted in 2016, consisting of gravity feed to trucks, with a maximum loading capacity of 40,000 pounds of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the silo.
- (h) One (1) wood-fired boiler, identified as BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 10.0 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S1.
- Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER1 is considered an affected facility.
- (i) One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.
- Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.
- (j) One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.
- Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.
- (k) One (1) diesel fuel-fired boiler, used as a backup boiler, identified as DB1, in service in 1990, with a maximum heat input rate of 4.2 MMBtu/hr, uncontrolled and exhausting outside the building.
- Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), the diesel fuel-fired boiler is considered an affected facility.
- (l) One (1) automated surface coating line, identified as SC-1, constructed in 2008, with a maximum throughput capacity of 24,000 board feet per hour, equipped with high volume low pressure (HVLP) spray guns, using dry filters for particulate matter control, exhausting through stacks SC-1, SC-2, SC-3, and SC-4.
- (m) Two (2) low-pressure airless spray guns, identified as GREENSHED (formerly EU03-2), constructed in 1998, used for coating wood board ends in Site Buildings 6 and 10, with a maximum throughput capacity of 16,000 board feet (92,800 pounds) per hour, uncontrolled, exhausting inside the building.
- (n) One (1) low-pressure airless spray gun, identified as STENCIL (formerly EU03-1), constructed in 1998, used for stenciling and coating wood board ends, with a maximum throughput capacity of 4,000 board feet (16,800 pounds) per hour, uncontrolled, exhausting inside the building.

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A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

- (a) One (1) cold cleaner degreaser, identified as DEGREASER, constructed in 2004, and permitted in 2016, utilizing a solvent having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) one-tenth (0.1) pound per square inch measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2] [326 IAC 8-3-8]
- (b) One (1) gasoline dispensing facility, identified as GDF, constructed in 1983 and permitted in 2016, having a maximum storage capacity of 500 gallons, filling storage tanks having a maximum capacity equal to or less than 10,500 gallons, and dispensing less than 300 gallons per month.

Under 40 CFR 63, Subpart CCCCC (NESHAPs for Source Category: Gasoline Dispensing Facilities), this unit is considered an affected facility.

- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

- (a) Twenty (20) wood-drying kilns, identified as KILN1 through KILN20, heated with steam from the wood-fired boilers (BOILER1, BOILER2, and BOILER3), having a "worst case" maximum throughput capacity of 144,000 board feet (144 mbf) per batch, each, uncontrolled, exhausting outside the building, and constructed according to the following schedule:
 - (1) KILN1 through KILN4, constructed in 1989 and permitted in 2016.
 - (2) KILN5 through KILN8, constructed in 1978 and permitted in 2016.
 - (3) KILN9 through KILN12, constructed in 1999 and permitted in 2016.
 - (4) KILN13 through KILN16, constructed in 1991 and permitted in 2016; and
 - (5) KILN17 through KILN20, constructed in 1993 and permitted in 2016.
- (b) One (1) aerosol spray coating operation, identified as AEROSOL, permitted in 2016, using hand-held aerosol spray cans for bulk product (wood) marking purposes, using a maximum of 20 aerosol spray cans (up to 11 ounces each) per month, uncontrolled and conducted both inside and outside the building.
- (c) Two (2) enclosed belt conveying systems, identified as CH-WWBCS and IDI-WWBCS, constructed in 1983 and 1999, and permitted in 2016, for transport of waste wood from the MILL, IDI, and RETAIL woodworking lines to grinding machines CH-HOG, IDI-HOG1, and IDI-HOG2, respectively, with bottlenecked throughput capacities of 8.4 and 92.8 tons of wood scrap per hour, respectively, uncontrolled and exhausting outside the building.
- (d) One (1) gluing operation, identified as ADHESIVE, permitted in 2016, applying water-based wood adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs. [326 IAC 2-7-1(21)(J)(ix)(EE)]
- (e) One (1) diesel dispensing facility, identified as DDF, constructed in 1979 and permitted in 2016, having a storage capacity of 5,000 gallons, and dispensing less than 1,800 gallons per month. [326 IAC 2-7-1(21)(J)(ii)(BB)]

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- (f) Ash handling and disposal, identified as AHD, consisting of hand raking, wheelbarrows, front end loaders, and dump trucks, with a maximum throughput of 0.30 tons of ash per hour, uncontrolled, and exhausting partly inside and partly outside the building. [326 IAC 6-3]
- (g) Sawdust handling, identified as SHD, consisting of telescoping chutes, hand raking, wheelbarrows, front end loaders, and dump trucks, with a maximum throughput of 20 tons of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the building. [326 IAC 6-3]
- (h) Blowdown for any of the following: sight glass; boilers; compressors, pumps; and cooling.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

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SECTION B

GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

- (a) This permit, T017-35999-00028, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

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

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

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

and

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

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

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- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T017-35999-00028 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

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- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

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- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

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SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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Testing Requirements [326 IAC 2-7-6(1)]

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(11)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, 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 Part 70 permit.

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.18 General Reporting Requirements [326 IAC 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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- (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.19 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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Woodworking

- (a) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as the MILL, constructed in 1998, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, equipped with one (1) baghouse (BH-1) determined integral to the process, exhausting through Stack DC1.
- (b) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as IDI, constructed in 1990, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, equipped with six (6) baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, and BH-6) determined integral to the process, exhausting through stacks IDI01, IDI02, and IDI03.
- (c) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as RETAIL, constructed in 1999, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, equipped with one (1) baghouse (BH-7) determined integral to the process, exhausting into the HOG building.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from woodworking line IDI shall not exceed 43.88 pounds per hour when operating at a process weight rate of 46.4 tons per hour.

The pounds per hour emission limitation was calculated as follows:

Interpolation and extrapolation of the data for process weight rates in excess of sixty thousand (60,000) pounds per hour, or thirty (30) tons per hour, shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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 2-7-5(1)]

D.1.3 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to assure compliance with Condition D.1.1, the six (6) integral baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, and BH-6) serving woodworking line IDI shall be in operation and control particulate emissions from the woodworking equipment comprising woodworking line IDI, at all times that any of the associated woodworking equipment is in operation.
- (b) In order to assure that woodworking lines MILL and RETAIL are exempt from the requirements of 326 IAC 6-3-2, the integral baghouses (BH-1 and BH-7) serving woodworking lines MILL and RETAIL shall be in operation and control particulate emissions from the woodworking equipment comprising woodworking lines MILL and RETAIL, at all times that any of the associated woodworking equipment is in operation.

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

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of each of the seven (7) baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, and BH-7) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.5 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the seven (7) baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, and BH-7) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

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- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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SECTION D.2

EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(14)]: Wood Grinding, Conveying, and Storage

- (d) One (1) Cole Hardwood Wood Hog grinder, identified as CH-HOG, constructed in 1983 and permitted in 2000, having a maximum throughput capacity of 8.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-8), exhausting outside the building.
- (e) One (1) IDI Wood Hog grinder, identified as IDI-HOG1, constructed in 1990 and permitted in 2000, having a maximum throughput capacity of 46.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-2), exhausting outside the building.
- (f) One (1) IDI Wood Hog grinder, identified as IDI-HOG2, constructed in 2005 and permitted in 2016, having a maximum throughput capacity of 92.8 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-4) and exhausting outside the building.
- (g) Ground wood conveying and storage operations, consisting of:
 - (1) One (1) pneumatic conveying system, identified as CH-GWPCS, constructed in 1983 and permitted in 2000, for transport of ground wood from grinding machine CH-HOG to storage silo CH-SILO1, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo CH-SILO1 baghouse (CH-BH) stack CH-BH-S1.
 - (2) One (1) ground wood storage silo, identified as CH-SILO1, constructed in 1983, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, and a total storage capacity of 15,724 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (CH-BH), exhausting to stack CH-BH-S1.
 - (4) One (1) pneumatic conveying system, identified as IDI-GWPCS1, constructed in 1990 and permitted in 2000, for transport of ground wood from grinding machine IDI-HOG1 to storage silo IDI-SILO1, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO1 baghouse (IDI-BH1) stack IDI-BH-S1.
 - (5) One (1) ground wood storage silo, identified as IDI-SILO1, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH1), exhausting to stack IDI-BH-S1.
 - (6) One (1) pneumatic conveying system, identified as IDI-GWPCS2, constructed in 2005 and permitted in 2016, for transport of ground wood from grinding machine IDI-HOG2 to storage silo IDI-SILO2, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO2 baghouse (IDI-BH2) stack IDI-BH-S2.
 - (7) One (1) ground wood storage silo, identified as IDI-SILO2, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH2), exhausting to stack IDI-BH-S2.
 - (8) One (1) ground wood auger conveying system, identified as IDI-GWACS, constructed in 1990 and permitted in 2000, for transport of ground wood from ground wood storage silo IDI-SILO2 to the BOILER2 feed system, with a bottlenecked throughput capacity of 1.26 tons of ground wood per hour, uncontrolled and exhausting outside the building; and

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- (9) Sawdust loading, identified as SLOAD, constructed in 1990 and permitted in 2016, consisting of gravity feed to trucks, with a maximum loading capacity of 40,000 pounds of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the silo.

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

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

D.2.1 PSD Minor Limits: PM, PM10, and PM2.5 [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions (after control) from each of the wood grinders and ground wood conveying and storage operations shall not exceed the corresponding pound per hour limitations listed in the table below:

Process	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
CH-HOG	2.94	1.68	1.68
IDI-HOG1	4.87	2.78	2.78
IDI-HOG2	9.74	5.57	5.57
CH-GWPCS and Storage Silo CH-SILO1	2.52	2.12	2.12
IDI-GWPCS1 and Storage Silo IDI-SILO1	4.18	3.51	3.51
IDI-GWPCS2 and Storage Silo IDI-SILO2	8.35	7.02	7.02

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

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

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the wood grinders and ground wood conveying and storage operations shall not exceed the corresponding pound per hour limitation listed in the table below:

Emission Unit	Process Weight Rate (tons/hr)	Process Weight Rate (lb/hr)	326 IAC 6-3 Allowable Emission Rate (lbs/hour)
CH-HOG	8.4	16,800	17.06
IDI-HOG1	46.4	92,800	43.88
IDI-HOG2	92.8	185,600	50.53
CH-GWPCS	8.4	16,800	17.06
IDI-GWPCS1	46.4	92,800	43.88
IDI-GWPCS2	92.8	185,600	50.53
CH-GWACS	1.78	3,550	6.02
IDI-GWACS	1.26	2,513	4.78

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

In order to assure compliance with Conditions D.2.1 and D.2.2:

- (a) The baghouses (BH-2, BH-4, and BH-8) for particulate control shall be in operation and control emissions from each of the wood hog grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) at all times when the respective wood hog grinder is in operation.
- (b) The baghouses (CH-BH-S1, IDI-BH-S1, and IDI-BH-S2) for particulate control shall be in operation and control emissions from each of the ground wood conveying and storage operations (CH-GWPCS, IDI-GWPCS1, and IDI-GWPCS2) at all times when the respective ground wood conveying and storage equipment is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the three (3) wood hog grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the ground wood conveying and storage operations (CH-GWPCS, IDI-GWPCS1, and IDI-GWPCS2) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C -Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the three (3) wood hog grinders (CH-HOG, IDI-HOG1, and IDI-HOG2), and ground wood conveying and storage operations (CH-GWPCS, IDI-GWPCS1, and IDI-GWPCS2) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Descriptions [326 IAC 2-7-5(14)]: Boilers

- (h) One (1) wood-fired boiler, identified as BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 10.0 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S1.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER1 is considered an affected facility.

- (i) One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.

- (j) One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.

- (k) One (1) diesel fuel-fired boiler, used as a backup boiler, identified as DB1, in service in 1990, with a maximum heat input rate of 4.2 MMBtu/hr, uncontrolled and exhausting outside the building.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), the diesel fuel-fired boiler is considered an affected facility.

(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 2-7-5(1)]

D.3.1 Fuel Specifications [326 IAC 4-2] [40 CFR 60, Subpart AAAA] [40 CFR 60, Subpart EEEE]

In order to render the provisions of 40 CFR 60, Subpart AAAA and 40 CFR 60, Subpart EEEE not applicable, the Permittee shall combust only clean wood in each of the wood-fired boilers (BOILER1, BOILER2, and BOILER3).

For the purposes of this permit, *clean wood* only consists of uncoated, unpainted, and untreated wood (including lumber), wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials, including whole or chipped tree stumps, and whole or chipped tree limbs. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

Compliance with this requirement shall render the requirements of 326 IAC 4-2 (Incinerators), and 326 IAC 12 (40 CFR 60, Subpart AAAA - New Source Performance Standards for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 and 40 CFR 60, Subpart EEEE - New Source Performance Standards for Other Solid Waste Incineration Units for

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Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006) not applicable.

D.3.2 PSD Minor Limits: PM, PM10, and PM2.5 [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions (after control) from the wood-fired boilers (BOILER1, BOILER2, and BOILER3) shall not exceed the corresponding pound per hour limitations listed in the table below:

Process	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
BOILER1	5.60	5.17	4.47
BOILER2	3.09	2.85	2.47
BOILER3	3.38	3.12	2.70

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

D.3.3 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

- Pursuant to 326 IAC 6-2-4, emissions from the wood-fired boiler, identified as BOILER1, shall be limited to 0.60 pounds per MMBtu heat input.
- Pursuant to 326 IAC 6-2-4, emissions from the wood-fired boiler, identified as BOILER2, shall be limited to 0.44 pounds per MMBtu heat input.
- Pursuant to 326 IAC 6-2-4, emissions from the wood-fired boiler, identified as BOILER3, shall be limited to 0.39 pounds per MMBtu heat input.
- Pursuant to 326 IAC 6-2-4, emissions from the diesel fuel-fired boiler, identified as DB1, shall be limited to 0.44 pounds per MMBtu heat input.

The allowable emission limits are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Pt = \text{pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.}$$

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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 2-7-5(1)]

D.3.5 Particulate Matter (PM) [326 IAC 2-7-6(6)]

In order to assure compliance with Condition D.3.2, the multiclones for particulate control shall be in operation and control emissions from wood-fired boilers BOILER2 and BOILER3 at all times that the associated boiler is in operation.

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

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of each of the wood-fired boilers' (BOILER1, BOILER2, and BOILER3) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.3.7 Cyclone Failure Detection

In the event that cyclone failure has been observed, the following shall apply:

- (a) For a cyclone controlling emissions from a process operated continuously, the failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps shall be considered a deviation from this permit.
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps shall be considered a deviation from this permit.

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

D.3.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of wood-fired boilers BOILER2 and BOILER3 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

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SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Surface Coating Operations

- (l) One (1) automated surface coating line, identified as SC-1, constructed in 2008, with a maximum throughput capacity of 24,000 board feet per hour, equipped with high volume low pressure (HVLP) spray guns, using dry filters for particulate matter control, exhausting through stacks SC-1, SC-2, SC-3, and SC-4.
- (m) Two (2) low-pressure airless spray guns, identified as GREENSHED (formerly EU03-2), constructed in 1998, used for coating wood board ends in Site Buildings 6 and 10, with a maximum throughput capacity of 16,000 board feet (92,800 pounds) per hour, uncontrolled, exhausting inside the building.
- (n) One (1) low-pressure airless spray gun, identified as STENCIL (formerly EU03-1), constructed in 1998, used for stenciling and coating wood board ends, with a maximum throughput capacity of 4,000 board feet (16,800 pounds) per hour, uncontrolled, exhausting inside the building.

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

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

D.4.1 Particulate (PM) [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from automated surface coating line SC-1 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(d) particulate emissions from the two (2) low-pressure airless spray guns (GREENSHED) shall be controlled using the following equivalent control methods (work practices):

The Permittee shall:
 - (A) Spray coat only wood and wood derived materials.
 - (B) Operate the coating operation inside the building.
 - (C) Use applicators with tips and pressures that do not atomize spray.
 - (D) Spray no further than 36" from the coating surface.
 - (E) Maintain and operate the spray application equipment in accordance with the manufacturer's recommendations.
 - (F) Install overspray controls if accumulations of overspray are observed anywhere on the building or grounds outside the building.
- (c) Pursuant to 326 IAC 6-3-2(d) particulate emissions from the low-pressure airless spray gun (STENCIL) shall be controlled using the following equivalent control methods (work practices):

The Permittee shall:
 - (A) Spray coat only wood and wood derived materials.
 - (B) Operate the coating operation inside the building.
 - (C) Use applicators with tips and pressures that do not atomize spray.
 - (D) Spray no further than 36" from the coating surface.

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- (E) Maintain and operate the spray application equipment in accordance with the manufacturer's recommendations.
- (F) Install overspray controls if accumulations of overspray are observed anywhere on the building or grounds outside the building.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the automated surface coating line SC-1, the Permittee shall perform the surface coating of wood furniture, wood cabinets, and components of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

- Airless spray application
- Air assisted airless spray application
- Electrostatic spray application
- Electrostatic bell or disc application
- Heated airless spray application
- Roller coating
- Brush or wipe application; or
- Dip-and-drain application

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

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.4.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to assure compliance with Condition D.4.1(a), the dry particulate filters for particulate control shall be in operation and control emissions from automated surface coating line SC-1 at all times when automated surface coating line SC-1 is in operation.
- (b) In order to assure compliance with Conditions D.4.1(b), and D.4.1(c), the equivalent control methods (work practices) for particulate control shall be observed at all times when the two (2) low-pressure airless spray guns (GREENSHED) and low-pressure airless spray gun (STENCIL) are in operation.

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

D.4.5 Dry Filter Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry particulate filters. To monitor the performance of the filters, weekly observations shall be made of the overspray from automated surface coating line SC-1 stacks (SC-1, SC-2, SC-3, and SC-4) exhausts while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the

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reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.4.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.5, the Permittee shall maintain a log of daily dry particulate filter inspections, weekly overspray observations, and monthly inspections. The Permittee shall include in its daily record when a dry particulate filter inspection is not performed and the reason for the lack of dry particulate filter inspection notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Degreasers

Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

- (a) One (1) cold cleaner degreaser, identified as DEGREASER, constructed in 2004 and permitted in 2016, utilizing a solvent having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) one-tenth (0.1) pound per square inch measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, does not exceed one hundred forty-five (145) gallons per twelve (12) months [326 IAC 8-3-2] [326 IAC 8-3-8]

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements), for cold cleaning operations constructed after January 1, 1980, the Permittee shall comply with the following:

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover;
 - (2) Equip the degreaser with a device for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operation requirements in subdivisions (3), (4), (6), and (7);
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.

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- (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

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

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

D.5.4 Record Keeping Requirements

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

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SECTION E.1

NSPS REQUIREMENTS

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Boilers

- (i) One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.

- (j) One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

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

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

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

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

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

The Permittee shall comply with the following provisions of 40 CFR 60, Subpart Dc (*included as Attachment A to the operating permit*), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

- (1) 40 CFR 60.40c(a), (b), (c), and (d).
- (2) 40 CFR 60.41c; and
- (3) 40 CFR 60.48c(a)(1), (a)(3), (g), and (i).

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SECTION E.2

NESHAP REQUIREMENTS

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Boilers

- (h) One (1) wood-fired boiler, identified as BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 10.0 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S1.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER1 is considered an affected facility.

- (i) One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.

- (j) One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.

- (k) One (1) diesel fuel-fired boiler, used as a backup boiler, identified as DB1, in service in 1990, with a maximum heat input rate of 4.2 MMBtu/hr, uncontrolled and exhausting outside the building.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), the diesel fuel-fired boiler is considered an affected facility.

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

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

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

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJJJJJ.

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

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

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJJJ (included as Attachment B to the operating permit), for the emission unit(s) listed above:

- (A) 40 CFR 63.11193.
- (B) 40 CFR 63.11194(a), (a)(1), (b), and (f).
- (C) 40 CFR 63.11196(a), (a)(1), and (a)(3).
- (D) 40 CFR 63.11200(b).
- (E) 40 CFR 63.11201(a), (b), and (d).
- (F) 40 CFR 63.11205(a).
- (G) 40 CFR 63.11210(c).
- (H) 40 CFR 63.11214(b).
- (I) 40 CFR 63.11223(a).
- (J) 40 CFR 63.11225(a), (a)(1), (a)(2), (a)(4), (a)(4)(i), (a)(4)(ii), (a)(4)(iii), (a)(4)(vi), and (a)(5).
- (K) 40 CFR 63.11225(b), (b)(1), (b)(2), (b)(2)(i), (b)(2)(iii), and (b)(3).
- (L) 40 CFR 63.11225(c), (c)(1), (c)(2), (c)(2)(i), (c)(2)(iii), (c)(4), (c)(5), (c)(6), and (d).
- (M) 40 CFR 63.11235.
- (N) 40 CFR 63.11236.
- (O) 40 CFR 63.11237.
- (P) Table 2 (items 6 and 16); and
- (Q) Table 8.

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SECTION E.3

NESHAP REQUIREMENTS

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Gasoline Dispensing Facilities (GDF)

- (b) One (1) gasoline dispensing facility, identified as GDF, constructed in 1983 and permitted in 2016, having a maximum storage capacity of 500 gallons, filling storage tanks having a maximum capacity equal to or less than 10,500 gallons, and dispensing less than 300 gallons per month.

Under 40 CFR 63, Subpart CCCCCC (NESHAPs for Source Category: Gasoline Dispensing Facilities), this unit is considered an affected facility.

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

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

E.3.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.

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

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

E.3.2 National Emissions Standards for Hazardous Air Pollutants for Source Category Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment C to the operating permit), for the emission unit(s) listed above:

- | | |
|---|---------------------------|
| (1) 40 CFR 63.11110. | (7) 40 CFR 63.11125(d). |
| (2) 40 CFR 63.11111(a), (b), (e), (f), (h), (i), and (j). | (8) 40 CFR 63.11126(b). |
| (3) 40 CFR 63.11112(a), and (b). | (9) 40 CFR 63.11130. |
| (4) 40 CFR 63.11113(a), and (a)(1). | (10) 40 CFR 63.11131. |
| (5) 40 CFR 63.11115. | (11) 40 CFR 63.11132; and |
| (6) 40 CFR 63.11116. | (12) Table 3. |

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

Source Name: Cole Hardwood, Inc.
Source Address: 1611 West Market Street, Logansport, Indiana 46947
Part 70 Permit No.: T017-35999-00028

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Cole Hardwood, Inc.
Source Address: 1611 West Market Street, Logansport, Indiana 46947
Part 70 Permit No.: T017-35999-00028

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
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: _____

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

Source Name: Cole Hardwood, Inc.
Source Address: 1611 West Market Street, Logansport, Indiana 46947
Part 70 Permit No.: T017-35999-00028

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:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Part 70 Operating Permit Renewal
and Significant Source Modification

Source Background, Description, and Location

Source Name:	Cole Hardwood, Inc.
Source Location:	1611 West Market Street, Logansport, IN 46947
County:	Cass
SIC Code:	Cole Hardwood, Inc.: 5031 (Lumber, Millwork, and Wood Panels) 2421 (Sawmills and Planing Mills, General); Indiana Dimension, Inc.: 2434 (Wood Kitchen Cabinets); and 2431 (Millwork).
Part 70 Operating Permit Renewal No.:	T017-35999-00028
Significant Source Modification No.:	017-37058-00028
Permit Reviewer:	Hannah L. Desrosiers

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Cole Hardwood, Inc. relating to the continued operation of, and modification to, an existing stationary hardwood concentration yard and wholesale operation, and hardwood dimensions, panels, moldings, and cabinet components manufacturing and surface coating facility.

On June 29, 2015, Cole Hardwood, Inc. submitted an application to the OAQ requesting to renew its operating permit. Additionally, Cole Hardwood, Inc. has applied for a Significant Source Modification in order to add a number of emission units and insignificant activities to the permit, and to reflect a change in operation. This proposed source modification is discussed in the "Description of the Proposed Modification" section below. Cole Hardwood, Inc. was issued its second Part 70 Operating Permit Renewal (T017-29073-00028) on April 26, 2011.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as the MILL, constructed in 1998, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, equipped with one (1) baghouse (BH-1) determined integral to the process, exhausting through Stack DC1.
- (b) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as IDI, constructed in 1990, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, equipped with six (6) baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, and BH-6) determined integral to the process, exhausting through stacks IDI01, IDI02, and IDI03.
- (c) One (1) woodworking line, consisting of various wood surfacing and dimensioning equipment, identified as RETAIL, constructed in 1999, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, equipped with one (1) baghouse (BH-7) determined integral to the process, exhausting into the HOG building.

- (d) One (1) Cole Hardwood Wood Hog grinder, identified as CH-HOG, constructed in 1983 and permitted in 2000, having a maximum throughput capacity of 8.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-8), exhausting outside the building.
- (e) One (1) IDI Wood Hog grinder, identified as IDI-HOG1, constructed in 1990 and permitted in 2000, having a maximum throughput capacity of 46.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-2), exhausting outside the building.
- (f) Ground wood conveying and storage operations, consisting of:
 - (1) One (1) pneumatic conveying system, identified as CH-GWPCS, constructed in 1983 and permitted in 2000, for transport of ground wood from grinding machine CH-HOG to storage silo CH-SILO1, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo CH-SILO1 baghouse (CH-BH) stack CH-BH-S1.
 - (2) One (1) ground wood storage silo, identified as CH-SILO1, constructed in 1983, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, and a total storage capacity of 15,724 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (CH-BH), exhausting to stack CH-BH-S1.
 - (3) One (1) ground wood auger conveying system, identified as CH-GWACS, constructed in 1983 and permitted in 2000, for transport of ground wood from ground wood storage silo CH-SILO1 to the BOILER1 and BOILER3 feed system, with a bottlenecked throughput capacity of 1.78 tons of ground wood per hour, uncontrolled and exhausting outside the building.
 - (4) One (1) pneumatic conveying system, identified as IDI-GWPCS1, constructed in 1990 and permitted in 2000, for transport of ground wood from grinding machine IDI-HOG1 to storage silo IDI-SILO1, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO1 baghouse (IDI-BH1) stack IDI-BH-S1.
 - (5) One (1) ground wood storage silo, identified as IDI-SILO1, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH1), exhausting to stack IDI-BH-S1.
 - (6) One (1) ground wood auger conveying system, identified as IDI-GWACS, constructed in 1990 and permitted in 2000, for transport of ground wood from ground wood storage silo IDI-SILO2 to the BOILER2 feed system, with a bottlenecked throughput capacity of 1.26 tons of ground wood per hour, uncontrolled and exhausting outside the building; and
 - (7) Sawdust loading, identified as SLOAD, constructed in 1990 and permitted in 2016, consisting of gravity feed to trucks, with a maximum loading capacity of 40,000 pounds of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the silo.
- (g) One (1) wood-fired boiler, identified as BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of

10.0 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S1.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER1 is considered an affected facility.

- (h) One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.

- (i) One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.

- (j) One (1) diesel fuel-fired boiler, used as a backup boiler, identified as DB1, in service in 1990, with a maximum heat input rate of 4.2 MMBtu/hr, uncontrolled and exhausting outside the building.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), the diesel fuel-fired boiler is considered an affected facility.

- (k) One (1) automated surface coating line, identified as SC-1, constructed in 2008, with a maximum throughput capacity of 24,000 board feet per hour, equipped with high volume low pressure (HVLP) spray guns, using dry filters for particulate matter control, exhausting through stacks SC-1, SC-2, SC-3, and SC-4.
- (l) Two (2) low-pressure airless spray guns, identified as GREENSHED (formerly EU03-2), constructed in 1998, used for coating wood board ends in Site Buildings 6 and 10, with a maximum throughput capacity of 16,000 board feet (92,800 pounds) per hour, uncontrolled, exhausting inside the building.
- (m) One (1) low-pressure airless spray gun, identified as STENCIL (formerly EU03-1), constructed in 1998, used for stenciling and coating wood board ends, with a maximum throughput capacity of 4000 board feet (16,800 pounds) per hour, uncontrolled, exhausting inside the building.

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 operated without a permit:

- (a) One (1) IDI Wood Hog grinder, identified as IDI-HOG2, constructed in 2005 and permitted in 2016, having a maximum throughput capacity of 92.8 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-4) and exhausting outside the building.

- (b) Ground wood conveying and storage operations, consisting of:
 - (1) One (1) pneumatic conveying system, identified as IDI-GWPCS2, constructed in 2005 and permitted in 2016, for transport of ground wood from grinding machine IDI-HOG2 to storage silo IDI-SILO2, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO2 baghouse (IDI-BH2) stack IDI-BH-S2.
 - (2) One (1) ground wood storage silo, identified as IDI-SILO2, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH2), exhausting to stack IDI-BH-S2.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from this existing source during this review process.

Insignificant Activities

The source consists of the following specifically regulated insignificant activities:

- (a) One (1) cold cleaner degreaser, identified as DEGREASER, constructed in 2004, and permitted in 2016, utilizing a solvent having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) one-tenth (0.1) pound per square inch measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2][326 IAC 8-3-8]
- (b) One (1) gasoline dispensing facility, identified as GDF, constructed in 1983 and permitted in 2016, having a maximum storage capacity of 500 gallons, filling storage tanks having a maximum capacity equal to or less than 10,500 gallons, and dispensing less than 300 gallons per month.

Under 40 CFR 63, Subpart CCCCCC (NESHAPs for Source Category: Gasoline Dispensing Facilities), this unit is considered an affected facility.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

The source also consists of the following insignificant activities:

- (a) Twenty (20) wood-drying kilns, identified as KILN1 through KILN20, heated with steam from the wood-fired boilers (BOILER1, BOILER2, and BOILER3), having a "worst case" maximum throughput capacity of 144,000 board feet (144 mbf) per batch, each, uncontrolled, exhausting outside the building, and constructed according to the following schedule:
 - (1) KILN1 through KILN4, constructed in 1989 and permitted in 2016.
 - (2) KILN5 through KILN8, constructed in 1978 and permitted in 2016.
 - (3) KILN9 through KILN12, constructed in 1999 and permitted in 2016.
 - (4) KILN13 through KILN16, constructed in 1991 and permitted in 2016; and
 - (5) KILN17 through KILN20, constructed in 1993 and permitted in 2016.

- (b) One (1) aerosol spray coating operation, identified as AEROSOL, permitted in 2016, using hand-held aerosol spray cans for bulk product (wood) marking purposes, using a maximum of 20 aerosol spray cans (up to 11 ounces each) per month, uncontrolled and conducted both inside and outside the building.
- (c) Two (2) enclosed belt conveying systems, identified as CH-WWBCS and IDI-WWBCS, constructed in 1983 and 1999, and permitted in 2016, for transport of waste wood from the MILL, IDI, and RETAIL woodworking lines to grinding machines CH-HOG, IDI-HOG1, and IDI-HOG2, respectively, with bottlenecked throughput capacities of 8.4 and 92.8 tons of wood scrap per hour, respectively, uncontrolled and exhausting outside the building.
- (d) One (1) gluing operation, identified as ADHESIVE, permitted in 2016, applying water-based wood adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs. [326 IAC 2-7-1(21)(J)(ix)(EE)]
- (e) One (1) diesel dispensing facility, identified as DDF, constructed in 1979 and permitted in 2016, having a storage capacity of 5,000 gallons, and dispensing less than 1,800 gallons per month. [326 IAC 2-7-1(21)(J)(ii)(BB)]
- (f) Ash handling and disposal, identified as AHD, consisting of hand raking, wheelbarrows, front end loaders, and dump trucks, with a maximum throughput of 0.30 tons of ash per hour, uncontrolled, and exhausting partly inside and partly outside the building. [326 IAC 6-3]
- (g) Sawdust handling, identified as SHD, consisting of telescoping chutes, hand raking, wheelbarrows, front end loaders, and dump trucks, with a maximum throughput of 20 tons of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the building. [326 IAC 6-3]
- (h) Blowdown for any of the following: sight glass; boilers; compressors, pumps; and cooling.

Air Pollution Control Justification as an Integral Part of the Process

- (a) 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 applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
- (b) As part of this application, the Permittee has submitted the following information to justify why each cyclone collector/airlock unit should be considered an integral part of the pneumatic ground wood conveying systems (CH-GWPCS, IDI-GWPCS1, IDI-GWPCS2) serving wood grinding machines (CH-HOG, IDI-HOG1, and IDI-HOG2) and associated ground wood storage silo (CH-SILO1, IDI-SILO1, and IDI-SILO2):

The control equipment serves a primary purpose other than pollution control and the process cannot operate without the control equipment:

Ground wood is pneumatically conveyed from each of the wood grinding machines (CH-HOG, IDI-HOG1, and IDI-HOG2) at the facility to a cyclone collector/airlock unit associated with the respective ground wood storage silo (CH-SILO1 and IDI-SILO1). In each cyclone collector/airlock unit, the product (ground wood) is separated from the air used for pneumatic conveyance through

centrifugal separation in a cyclone product collector. The product is then gravity fed through the associated airlock to the respective storage silo. All of the product that is conveyed must pass through a cyclone collector/airlock unit in order to be collected and emptied into the storage silos. The cyclone collector/airlock units are used exclusively for loading the storage silos, and particulate emissions from the silo loading process passes through each cyclone and to the associated silo baghouse. Therefore, each cyclone collector/airlock unit should be considered integral to the ground wood storage silo loading process. The cyclone collector/airlock units would be used regardless of any rules pertaining to dust emissions due to the fact that they are used as a product collector. Each cyclone collector/airlock unit and associated ground wood storage silo (CH-SILO1 and IDI-SILO1) are each equipped with a baghouse for particulate control, where the baghouse is used as a pollution control device and is not considered integral to the process.

IDEM, OAQ has evaluated the information submitted and agrees that each of the cyclone collector/airlock units should be considered an integral part of the pneumatic ground wood conveying systems (CH-GWPCS, IDI-GWPCS1, IDI-GWPCS2) associated with loading the ground wood storage silos. This determination is based on the fact that all of the product (ground wood) that is conveyed must pass through a cyclone collector/airlock unit in order to be collected and transferred into the storage silos (i.e., the purpose of the cyclone collector/airlock unit is product collection). Therefore, the potential to emit after the cyclone collector/airlock units is used for purposes of determining operating permit level and applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)). Operating conditions in the proposed permit will specify that the cyclone collector/airlock units shall operate at all times when the associated ground wood storage silo loading process is each in operation.

Operational Bottleneck

In production and project management, a bottleneck occurs when the maximum throughput capacity of one (1) process, in a chain of processes, reduces the throughput capacity of other processes in the chain, either preceding, following, or both.

According to Cole Hardwood, Inc., the maximum throughput capacities of the scrap wood handling, and ground wood pneumatic conveying to silo and associated silo loading processes are each limited by the maximum throughput capacities of the three (3) wood grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) to a bottlenecked throughput of 8.4 tons per hour for the CH-HOG systems, and 46.4 tons per hour for each of the IDI systems.

Additionally, the auger conveying of ground wood from the silos to the wood-fired boilers (BOILER1, BOILER2, and BOILER3) is limited by each boiler's maximum charging capacity to the bottlenecked throughputs of 1.78 (0.63 (BOILER1) + 1.15 (BOILER2)) and 1.26 (BOILER3) tons of ground wood per hour, respectively.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No.: T017-29073-00028, on April 26, 2011. There have been no subsequent approvals issued.

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.

County Attainment Status

The source is located in Cass County. The following attainment status designations are applicable to Cass County:

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

(Air Pollution Control Division; 326 IAC 1-4-10; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA; filed Jan 30, 2013, 12:34 p.m.: 20130227-IR-326110774FRA; filed Oct 25, 2013, 2:41 p.m.: 20131120-IR-326130164FRA)

- (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. Cass 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) PM2.5
 Cass 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
 Cass 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

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, therefore, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Emission Calculations

See Appendices A.1 and A.2 of this document for detailed emission calculations.

The following applies:

1. To form a conservative estimate, all of the emission calculations are based on 8,760 hours of operation.

2. PM2.5 emissions have been characterized for all emitting units.
3. Cole Hardwood, Inc. has indicated that the combined maximum throughput of all twenty (20) wood drying kilns is 1.3 million board feet per batch, or 2,000,000 board feet/month, and that the "worst case" maximum throughput capacity of the largest kiln is 144,000 board feet (144 mbf) per batch. IDEM has determined that since Cole Hardwood, Inc. does not know the "worst case" maximum throughput capacity of each kiln, that the "worst case" maximum throughput capacity of the largest kiln be used to calculate the PTE from each kiln.
4. There are no AP 42, or other emission factors for enclosed conveying of wood waste (scrap and board odds and ends produced by cutting during the manufacturing process). Therefore, to form a conservative estimate of emissions, emission factors from AP 42-11.19.2 Crushed Stone Processing and Pulverized Mineral Processing, Table 11.19.2-2 Emission Factors for Crushed Stone (English Units), Emission Factors for Crushed Stone Processing Operations (lb/ton), August 2004, SCC 3-05-020-06, (uncontrolled) conveyor transfer point, have been used.
5. There are no AP 42, or other emission factors for pneumatic and belt/auger conveying of ground wood. Therefore, Emission Factors from Fire Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC 3-07-008-03 (sawdust pile handling at a sawmill operation), have been used. (Note: The ground wood produced in each of the HOG grinders has the size, texture, and consistency of sawdust.)
6. IDEM has determined each of the cyclone collector/airlock units an integral part of the pneumatic ground wood storage silo loading processes. Therefore, the potential to emit after the cyclone collector/airlock units is used for purposes of determining operating permit level and applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
7. There are no AP 42, or other emission factors for pneumatically loading ground wood (sawdust) into storage silos. Therefore, to form a conservative estimate of emissions, emission factors from Fire Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC 3-07-008-03 (sawdust pile handling at a sawmill operation), have been used.
8. The Higher Heating Value (HHV) of the wood fuel (MMBtu/ton) is from AP 42-1.6 Wood Residue Combustion In Boilers, section 1.6.1 General. The values generally range between 4,500 Btu/lb of fuel on a wet as-fired basis, to 8,000 Btu/lb for dry wood. Since the ground wood combusted in the wood-fired boilers is repurposed waste wood (scrap) from the woodworking operations, and was kiln dried, 8,000 Btu/lb has been used. This value has been converted to MMBtu/ton.
9. To characterize emissions from the kilns, emission factors from AP-42 Chapter 10.5 (Plywood Manufacturing), Tables 10.5-2 and 10.5-3 (dated 01/02), for indirect heated, heated zones, hardwood (SCC # 3-07-007-56) and indirect heated, cooling section, hardwood (SCC # 3-07-007-57) with units of pounds of pollutant per thousand square feet of 3/8-inch thick veneer (lb/MSF 3/8), were used. The plywood manufacturing emission factors are for veneer drying, which occurs before adhesive is applied. From page 3: "When the veneers have been dried to their specified moisture content, they are conveyed to a layup operation, where a thermosetting resin is spread on the veneers." And "The laid-up assembly of veneers then is sent to a hot press in which it is consolidated under heat and pressure." The veneers must be dry prior to resin application so the resin adheres properly, and warping of the final product is minimized.
10. According to Cole Hardwood, the company routinely utilizes store-bought spray paint for bulk product marking. The spray paint is applied by hand using an aerosol spray can. It is estimated a maximum of 20 - 11 ounce cans of spray paint are used per month. The composition is not consistent, being either water-based or containing small amounts of VOC and potentially HAPs. To form a conservative estimate, IDEM has assumed that the spray paint is applied 5 days per week and 4 weeks per month, or 20 days per month, and 5 hrs per day. Additionally, the data

used to calculate PTE is typical for aerosol spray coatings used for marking purposes. The HAP displayed is the worst case from several different coatings.

11. The emission calculations for the one (1) low-pressure airless spray gun, identified as STENCIL (formerly EU03-1), and the two (2) low-pressure airless spray guns, identified as GREENSHED (formerly EU03-2), have been updated to reflect the change in coatings.

Unrestricted Potential Emissions

The following table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Greater than 250
PM ₁₀	Greater than 250
PM _{2.5}	Greater than 250
SO ₂	Less than 100
NO _x	Less than 100
VOC	Greater than 100, less than 250
CO	Greater than 100, less than 250
Total HAP	Less than 25
"Worst" Single HAP	Less than 10
<i>Appendix A.1 of this TSD reflects the unrestricted potential emissions of the source.</i>	

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 PM10, PM2.5, VOC, and CO is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) 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.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Source Status Prior to the Modification

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

This PTE table was taken directly from page 3 of 12, of the TSD for Part 70 Operating Permit Renewal No.: T017-29073-00028, issued on April 26, 2011. IDEM was not required to quantify PM2.5 emissions at the time of issuance.

Process/ emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
EU01-1 (now BOILER1)	26.3 ^a	26.3 ^a	1.10	0.57	26.28	21.46	1.46
EU01-2 (now BOILER2)	35.5 ^a	35.5 ^a	2.01	1.05	48.36	39.49	2.66
EU01-3 (now BOILER3)	34.3 ^a	34.3 ^a	2.20	1.14	52.82	43.14	2.98
Diesel-fired boiler	10.1 ^a	10.1 ^a	0.93	0.04	0.66	2.63	0.00
MILL	17.5 ^b	17.5 ^b	---	---	---	---	---
IDI	17.5 ^b	17.5 ^b	---	---	---	---	---
RETAIL	17.5 ^b	17.5 ^b	---	---	---	---	---
EU03-1 (now STENCIL)	0.04 ^c	0.04 ^c	---	4.50	---	---	---
EU03-2 (now GREENSHED)	0.22 ^c	0.22 ^c	---	24.9	---	---	---
SC-1	2.48	2.48	---	54.6	---	---	---
Total PTE	Less than 250	Less than 250	6.24	61.9	128.12	106.72	7.10
"a" = based on 326 IAC 6-2 emission limits "b" = based on 326 IAC 2-2 emission limits "c" = based on potential to emit (PTE)							

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, is emitted at a rate of 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).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of the Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Cole Hardwood, Inc. relating to the renewal of its Part 70 Operating Permit. Additionally, Cole Hardwood, Inc. has applied for a Significant Source Modification in order to add one (1) wood hog grinder, and associated material conveying and handling operations, twenty (20) wood-drying kilns, and a number of insignificant activities as described above in the Insignificant Activities section of this TSD to the permit.

The following is a list of the proposed emission units and pollution control device(s):

- (a) One (1) IDI Wood Hog grinder, identified as IDI-HOG2, constructed in 2005 and permitted in 2016, having a maximum throughput capacity of 92.8 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-4) and exhausting outside the building.
- (b) Ground wood conveying and storage operations, consisting of:
 - (1) One (1) pneumatic conveying system, identified as IDI-GWPCS2, constructed in 2005 and permitted in 2016, for transport of ground wood from grinding machine IDI-HOG2 to storage silo IDI-SILO2, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO2 baghouse (IDI-BH2) stack IDI-BH-S2.
 - (2) One (1) ground wood storage silo, identified as IDI-SILO2, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH2), exhausting to stack IDI-BH-S2.

Enforcement Issue

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

Permit Level Determination - Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has

been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification		326 IAC 2-7-10.5 Significant Source Modification Thresholds (tons/year)
Pollutant	Potential To Emit (ton/yr)	
PM	265.42	25
PM ₁₀	184.17	25
PM _{2.5}	213.43	25
SO ₂	0	25
NO _x	0	25
VOC	0	25
CO	0	100
Total HAPs	0	25
Single HAPs	0	10

Appendix A.2 of this TSD reflects the unrestricted potential emissions of the modification.

This source modification is subject to 326 IAC 2-7-10.5(g)(4)(A), since the potential to emit PM, PM10, and direct PM2.5 from the modification is greater than or equal to twenty-five (25) tons per year, each. The Part 70 Operating Permit Renewal will grant the source the appropriate operating approval for the proposed modification. Therefore, a distinct significant permit modification will not be issued.

Permit Level Determination - PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 New Source Review Permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Project Emissions (tons/yr)						
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO
IDI Wood Hog Grinder #2 (IDI-HOG2)	42.68	24.39	24.39	---	---	---	---
Wood Waste Conveying and Handling (belt)	1.22	0.45	0.45	---	---	---	---
Ground Wood Conveying and Handling (pneumatic)**	36.58	30.73	30.73	---	---	---	---
Total for Modification	80.48	55.56	55.56	---	---	---	---
PSD Major Source Thresholds	250	250	250	250	250	250	250

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

**PTE after integral cyclone collector/airlock unit.

Appendix A.2 of this TSD reflects the unrestricted potential emissions of the modification.

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.

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant are limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM, PM10, and PM2.5 emissions (after control) shall not exceed the corresponding pound per hour limitations listed in the table below:

Process	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
IDI-HOG2	9.74	5.57	5.57
IDI-GWPCS2 and Storage Silo IDI-SILO2	8.35	7.02	7.02

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

Potential to Emit After Issuance

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

The emissions in the following tables [below] are based upon TSD Appendices A.1 and A.2 of this document.

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
MILL Woodworking Line ^(a)	0.64 17.5	0.37 17.5	0.37	---	---	---	---	---	---
IDI Woodworking Line ^(a)	3.56 17.5	2.03 17.5	2.03	---	---	---	---	---	---
RETAIL Woodworking Line ^(a)	0.64 17.5	0.37 17.5	0.37	---	---	---	---	---	---
Wood Grinding ^(a) (CH-HOG, IDI-HOG1, and IDI-HOG2)	76.90	43.94	43.94	---	---	---	---	---	---
Ground Wood Conveying and Storage ^(a)	79.19	60.14	60.14	---	---	---	---	---	---
Wood-fired Boilers EU01-1, EU01-2, EU01-3 (BOILER1, BOILER2, and BOILER3)	52.86 96.1	48.80 96.1	48.80	5.31	46.73	2.76	127.46	7.49	4.06 (HCL)
SC-1 Coating Line ^(b)	24.83 2.48	24.83 2.48	24.83	---	---	54.58	---	0.00	---
KILNS 1-20	---	---	---	---	---	46.08	4.97	6.46	2.86 (methanol)
Waste Wood Conveying and Handling	1.33	0.49	0.49	---	---	---	---	---	---
STENCIL EU03-1 Coating Operation	1.04 0.22	1.04 0.22	1.04	---	---	1.61	---	1.61	1.61 (methanol)
GREENSHEDE EU03-2 Coating Operation	2.15 0.04	2.15 0.04	2.15	---	---	0.00	---	0.00	---
Aerosol Spray Coating	0.07	0.07	0.07	---	---	0.20	---	0.07	0.07 (toluene)
Adhesives	---	---	---	---	---	0.50	---	0.00	---
Cold Cleaner Degreaser	---	---	---	---	---	0.49	---	4.9E⁻⁰⁴	4.9E⁻⁰⁴ (toluene)
Diesel fuel-fired Boiler	0.26	0.31	0.28	9.33	2.63	0.04	0.66	9.0E ⁻⁰⁴	2.8E ⁻⁰⁴ (selenium)
Total Limited/Controlled PTE of Entire Source	243.46 225.68	184.54 218.78	177.90 217.49	14.64	49.36	106.27 113.80	133.08	15.63 18.45	4.47 (methanol)
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 HCL = Hydrogen Chloride
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant.
**PM_{2.5} listed is direct PM_{2.5}.
(a) Limited PM/PM10/PM2.5 PTE based on pound per hour emission limits to render the requirements of 326 IAC 2-2 (PSD) not applicable.
(c) Potential to emit (PTE) of surface coating line SC-1 are after consideration of the dry filter controls. See the " State Rule Applicability - Individual Facilities " section for more details.
Note: All remaining emissions listed in this table are unrestricted PTE.

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
MILL Woodworking Line ^(a)	0.64	0.37	0.37	---	---	---	---	---	---
IDI Woodworking Line ^(a)	3.56	2.03	2.03	---	---	---	---	---	---
RETAIL Woodworking Line ^(a)	0.64	0.37	0.37	---	---	---	---	---	---
Wood Grinding ^(a) (CH-HOG, IDI-HOG1, and IDI-HOG2)	76.90	43.94	43.94	---	---	---	---	---	---
Ground Wood Conveying, Handling, and Storage ^(a)	79.19	60.14	60.14	---	---	---	---	---	---
Wood-fired Boilers (Boiler1, Boiler2, and Boiler3)	52.86	48.80	42.19	5.31	46.73	2.76	127.46	7.49	4.06 (HCL)
SC-1 Coating Line ^(b)	24.83	24.83	24.83	---	---	54.58	---	0.00	---
KILNS 1-20	---	---	---	---	---	46.08	4.97	6.46	2.86 (methanol)
Waste Wood Conveying and Handling	1.33	0.49	0.49	---	---	---	---	---	---
STENCIL Coating Operation	1.04	1.04	1.04	---	---	1.61	---	1.61	1.61 (methanol)
GREENSHED Coating Operation	2.15	2.15	2.15	---	---	0.00	---	0.00	---
Aerosol Spray Coating	0.07	0.07	0.07	---	---	0.20	---	0.07	0.07 (toluene)
Adhesives	---	---	---	---	---	0.50	---	0.00	---
Cold Cleaner Degreaser	---	---	---	---	---	0.49	---	4.9E-4	4.9E-4 (toluene)
Diesel fuel-fired Boiler	0.26	0.31	0.28	9.33	2.63	0.04	0.66	9.0E-4	2.8E-4 (selenium)
Total Limited/Controlled PTE of Entire Source	243.46	184.54	177.90	14.64	49.36	106.27	133.08	15.63	4.47 (methanol)
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 HCL = Hydrogen Chloride
 * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.
 (a) Limited PM/PM10/PM2.5 PTE based on pound per hour emission limits to render the requirements of 326 IAC 2-2 (PSD) not applicable.
 (b) Potential to emit (PTE) of surface coating line SC-1 are after consideration of the dry filter controls. See the " State Rule Applicability - Individual Facilities " section for more details.
 Note: All remaining emissions listed in the above-table are unrestricted PTE.

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.

PSD Minor Source Status

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM, PM10, and PM2.5, is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants is less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

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

(1) Wood Grinding Operations

PM, PM10, and PM2.5 emissions (after control) from the wood hog grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) shall not exceed the corresponding pound per hour limitations listed in the table below:

Unit ID	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
CH-HOG	2.94	1.68	1.68
IDI-HOG1	4.87	2.78	2.78
IDI-HOG2	9.74	5.57	5.57

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

These are new requirements for this source.

Note: The limits in the table above were calculated based on the uncontrolled potential to emit calculations and assuming 70% control efficiency (CE).

(2) Ground Wood Conveying and Storage

PM, PM10, and PM2.5 emissions (after control) from the ground wood conveying and storage operations shall not exceed the corresponding pound per hour limitations listed in the table below:

Process	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
CH-GWPCS and Storage Silo CH-SILO1	2.52	2.12	2.12
IDI-GWPCS1 and Storage Silo IDI-SILO1	4.18	3.51	3.51
IDI-GWPCS2 and Storage Silo IDI-SILO2	8.35	7.02	7.02

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

These are new requirements for this source. This is a Title I change;

Note: The limits in the table above were calculated based on the uncontrolled potential to emit calculations and assuming 70% control efficiency (CE).

(3) Wood-fired Boilers

PM, PM10, and PM2.5 emissions (after control) from the wood-fired boilers shall not exceed the corresponding pound per hour limitations listed in the table below:

Unit ID	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
BOILER1	5.60	5.17	4.47
BOILER2	3.09	2.85	2.47
BOILER3	3.38	3.12	2.70

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

These are new requirements for this source. This is a Title I change;

Note: The limits in the table above were calculated based on the uncontrolled potential to emit calculations and assuming 70% control efficiency (CE).

(5) Fuel Specifications

(A) The Permittee shall combust only "clean wood" in each of the three (3) wood-fired boilers (BOILER1, BOILER2, and BOILER3).

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

Compliance with this requirement shall render the requirements of 326 IAC 4-2 (Incinerators), and 326 IAC 12 (40 CFR 60, Subpart AAAA - New Source Performance Standards for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 and 40 CFR 60, Subpart EEEE - New Source Performance Standards for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006) not applicable.

This is a change from defining clean wood as "untreated wood or untreated wood products including clean untreated lumber, whole or chipped tree stumps, and whole or chipped tree limbs".

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit	Unit ID	Pollutant	Control Device Used	Emission Limitation or Standard	Uncontrolled PTE (tons/year)	Limited / Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Woodworking Lines*	MILL	PM**	Integral Baghouse	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
	IDI	PM	Integral Baghouses	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
	RETAIL	PM**	Integral Baghouse	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
Cole Hardwood Wood Grinder	CH-HOG	PM**	Baghouse	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
IDI Wood Grinder #1	IDI-HOG1	PM**	Baghouse	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
IDI Wood Grinder #2	IDI-HOG2	PM**	Baghouse	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
CH-HOG Ground Wood Conveying and Storage *	CH-GWPCS	PM**	Integral Cyclone	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
IDI-HOG1 and IDI-HOG2 Ground Wood Conveying and Storage*	IDI-GWPCS1	PM**	Integral Cyclone	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
	IDI-GWPCS2	PM**	Integral Cyclone	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N

Emission Unit	Unit ID	Pollutant	Control Device Used	Emission Limitation or Standard	Uncontrolled PTE (tons/year)	Limited / Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Wood-fired Boilers	BOILER1	PM**	Multiclone	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
	BOILER2	PM**	Multiclone	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
	BOILER3	PM**	Multiclone	326 IAC 2-2	< 100	< 100	100	N	N
		PM10			< 100	< 100	100	N	N
		PM2.5			< 100	< 100	100	N	N
		PM**			< 100	< 100	100	N	N
Coating Line	SC-1	PM**	Dry Filters	326 IAC 6-3	< 100	< 100	100	N	N

* Potential to emit after consideration of inherent process equipment (woodworking operations & cyclone collector/airlock units baghouses)

**Under 326 IAC 6-3-2, PM is limited as a surrogate for the Part 70 regulated pollutant, PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of PM10.

Pursuant to 40 CFR Part 64.1, the definition of inherent process equipment is "equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered subject to CAM."

The following applies:

1. Baghouses BH-1 through BH-7, serving woodworking lines MILL, IDI, and RETAIL, are each determined to be necessary for the normal and proper operation of the woodworking operations (see the "Air Pollution Control Justification as an Integral Part of the Process" section above for more detail). Consequently, the seven (7) baghouses each meet the criteria for inherent to the process for the purpose of determining CAM applicability, and are not considered control devices. Therefore, the requirements of 40 CFR Part 64.2, CAM do not apply to baghouses BH-1 through BH-7, and are not included in the permit.
2. The two (2) cyclone collector/airlock units associated with the pneumatic ground wood conveying systems (CH-GWPCS, IDI-GWPCS1, IDI-GWPCS2) that are used to load the ground wood storage silos, are each determined necessary for the normal and proper operation of the wood grinding, conveying, and storage operations (see the "Air Pollution Control Justification as an Integral Part of the Process" section above for more detail). Consequently, each cyclone collector/airlock unit meets the criteria for inherent to the process for the purpose of determining CAM applicability, and is not considered a control device. Therefore, the requirements of 40 CFR Part 64.2, CAM do not apply to any of the cyclone collector/airlock units associated with the pneumatic ground wood conveying systems (CH-GWPCS, IDI-GWPCS1, IDI-GWPCS2) and are not included in the permit.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

This is a revised requirement for this source. The Woodworking Lines (MILL, IDI, and RETAIL), previously subject to CAM, each have particulate control devices (Baghouses BH-1 through BH-7) that have been determined inherent to the associated process. No

other units are subject to CAM. Therefore, the CAM requirements have been removed from the permit.

New Source Performance Standards (NSPS)

- (b) 40 CFR 60, Subpart D - Standards for Fossil-Fuel-Fired Steam Generators
- (1) The requirements of the Standards of Performance for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D (326 IAC 12), are not included in the permit for BOILER1, BOILER2, or BOILER3, since although each boiler was constructed after August 17, 1971 and fires wood-residue, as defined under 40 CFR 60.41 (Definitions), the heat input capacity from the fuel combusted in each boiler is less than 250 million Btu per hour.
 - (2) The requirements of the Standards of Performance for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D (326 IAC 12), are not included in the permit for the diesel fuel-fired backup boiler, since although the boiler was constructed after August 17, 1971 and fires diesel fuel oil, the heat input capacity from the fuel combusted in the boiler is less than 250 million Btu per hour.
- (c) 40 CFR 60, Subpart Da - Standards for Electric Utility Steam Generating Units
- (1) The requirements of the Standards of Performance for Electric Utility Steam Generating Units, 40 CFR 60, Subpart Da (326 IAC 12), are not included in the permit for BOILER1, BOILER2, or BOILER3, since although each boiler was constructed after September 18, 1978, the heat input capacity from fuel combusted in each boiler is less than 250 million Btu per hour and each boiler is not an electric utility steam-generating unit, as defined under 40 CFR 60.41Da - Definitions.
 - (2) The requirements of the Standards of Performance for Electric Utility Steam Generating Units, 40 CFR 60, Subpart Da (326 IAC 12), are not included in the permit for the diesel fuel-fired backup boiler, since although the boiler was constructed after September 18, 1978, the heat input capacity from fuel combusted in the boiler is less than 250 million Btu per hour and the boiler is not an electric utility steam-generating unit, as defined under 40 CFR 60.41Da - Definitions.
- (d) 40 CFR 60, Subpart Db - Standards for Industrial-Commercial-Institutional Steam Generating
- (1) The requirements of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating, 40 CFR 60, Subpart Db (326 IAC 12), are not included in the permit for BOILER1, BOILER2, or BOILER3, since although each boiler was constructed after June 19, 1984, the heat input capacity from fuel combusted in each boiler is less than 100 million Btu per hour.
 - (2) The requirements of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating, 40 CFR 60, Subpart Db (326 IAC 12), are not included in the permit for the diesel fuel-fired backup boiler, since although the boiler was constructed after June 19, 1984, the heat input capacity from fuel combusted in the boiler is less than 100 million Btu per hour.
- (e) 40 CFR 60, Subpart Dc - Standards for Small Industrial-Commercial-Institutional Steam Generating Units
- (1) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the existing wood-fired boiler (BOILER1), because although the unit has a maximum design heat input capacity less than 100 MMBtu/hr but greater than 10 MMBtu/hr, and meets the definition of a steam generating unit, combusting fuel to heat water or another heat transfer media, construction of the unit commenced in 1983, which was *before* the applicability date of June 9, 1989, and the unit

has never been modified or reconstructed, as defined under 40 CFR 60.14 and 40 CFR 60.15, respectively.

- (2) The existing wood-fired boilers (BOILER2 and BOILER3), in service in 1990 and 1997, respectively, are each subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12-1), since each unit was constructed after June 9, 1989, has a maximum design heat input capacity less than 100 MMBtu/hr but greater than 10 MMBtu/hr, and meets the definition of a steam generating unit, in that it combusts fuel to heat water or another heat transfer media.

The facilities subject to this rule include the following:

- One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.
- One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.

BOILER2 and BOILER3 are each therefore subject to the following applicable portions of Subpart Dc (*included as Attachment A of the permit*), as follows:

- (A) 40 CFR 60.40c(a), (b), (c), and (d).
- (B) 40 CFR 60.41c; and
- (C) 40 CFR 60.48c(a)(1), (a)(3), (g), and (i).

Note: There are no testing requirements applicable to this source for this NSPS.

The requirements of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to BOILER2 and BOILER3 except as otherwise specified in 40 CFR 60, Subpart Dc.

This is an existing requirement for this source.

- (f) 40 CFR 60, Subpart E - Standards for Incinerators
- (1) The requirements of the New Source Performance Standards (NSPS) for Incinerators, 40 CFR 60, Subpart E (326 IAC 12), are not included in the permit for any of the wood-fired boilers (BOILER1, BOILER2, or BOILER3), as follows:
- (A) BOILER1, BOILER2, and BOILER3 each do not meet the definition of an incinerator, in that each boiler is not used to burn solid waste (refuse) for the purpose of reducing the volume of the waste by removing combustible matter, but instead will only combust wood chips generated from "clean wood" (*see the "Potential to Emit After Issuance - PSD Minor Source Status" section above for more detail*) to heat water and to create steam for industrial uses; and
 - (B) Each boiler has a maximum charging capacity of less than 45 metric tons (50 tons) per day, as follows:

$$\text{Maximum charging capacity} = (\text{Maximum Heat Input Rate (MMBtu/hr)} / \text{Higher Heating Value of wood fuel (MMBtu/ton)}) * \text{maximum number of hours/day}$$

$$\text{BOILER1} = \frac{10.0 \text{ MMBtu/hr}}{16.0 \text{ MMBtu/ton}} * 24 \text{ hrs/day} = 15.0 \text{ tons/day.}$$

$$\text{BOILER2} = \frac{18.4 \text{ MMBtu/hr}}{16.0 \text{ MMBtu/ton}} * 24 \text{ hrs/day} = 27.6 \text{ tons/day.}$$

$$\text{BOILER3} = \frac{20.1 \text{ MMBtu/hr}}{16.0 \text{ MMBtu/ton}} * 24 \text{ hrs/day} = 30.2 \text{ tons/day.}$$

- (2) The requirements of the New Source Performance Standards (NSPS) for Incinerators, 40 CFR 60, Subpart E (326 IAC 12), are not included in the permit for the diesel fuel-fired boiler (DB1), since DB1 does not meet the definition of an incinerator, in that the boiler is not used to burn solid waste (refuse) for the purpose of reducing the volume of the waste by removing combustible matter, but instead will only combust diesel fuel to heat water and to create steam for industrial uses.
- (g) 40 CFR 60, Subpart DD - Standards of Performance for Grain Elevators
The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (2D) (326 IAC 12), are not included in the permit for any of the ground wood (sawdust) conveying, handling, and storage operations, because although this source will include a truck unloading station and a conveyor, the material being handled consists of clean, dry, wood chips (biomass), and not "grain" as defined under 40 CFR 60.301(a).
- (h) The requirements of the following New Source Performance Standards (NSPS) are not included in the permit, because the wood-fired boilers (BOILER1, BOILER2, or BOILER3) and the diesel fuel-fired boiler (DB1), are each not considered a municipal waste combustor or hospital/medical/infectious waste incinerator:
- (1) 40 CFR 60, Subpart Ea, Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced after December 20, 1989 and on or before September 20, 1994 (326 IAC 12)
 - (2) 40 CFR 60, Subpart Eb, Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced after September 20, 1994, or for Which Modification or Reconstruction is commenced after June 19, 1996 (326 IAC 12)
 - (3) 40 CFR 60, Subpart Ec, Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced after January 20, 1996 (326 IAC 12)
 - (4) 40 CFR 60, Subpart AAAA, Standards of Performance for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced after June 6, 2001 (326 IAC 12)
- (i) The following New Source Performance Standards are not included in the permit for the automated surface coating line (SC-1), low-pressure airless spray guns (GREENSHED and STENCIL), or the aerosol spray coating operation (AEROSOL), since this source applies coatings to wood and not metal furniture, automobile/light duty trucks, or large appliances:
- (1) 40 CFR 60, Subpart EE - Standards for Surface Coating of Metal Furniture (326 IAC 12);
 - (2) 40 CFR 60, Subpart MM - Standards for Automobile and Light Duty Truck Surface Coating Operations (326 IAC 12); or
 - (3) 40 CFR 60, Subpart SS - Standards for Industrial Surface Coating: Large Appliances (326 IAC 12).
- (j) 40 CFR 60, Subpart XX - NSPS for Bulk Gasoline Terminals
The requirements of the New Source Performance Standards for Bulk Gasoline Terminals, 40 CFR 60, Subpart XX (2X) (326 IAC 12), are not included in the permit, because the gasoline fuel

dispensing facility does not meet the definition of a bulk gasoline terminal, as defined under 40 CFR 60.501. The gasoline fuel dispensing facility is only capable of handling less than or equal to 1,300 gallons of gasoline per day.

- (k) 40 CFR 60, Subpart AAA - Standards for New Residential Wood Heaters
The requirements of the New Source Performance Standards for New Residential Wood Heaters, 40 CFR 60, Subpart AAA (3A) (326 IAC 12), are not included in the permit, since wood-fired boilers are specifically exempted under § 60.530(h)(2).
- (l) 40 CFR 60, Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001
- (1) The requirements of the New Source Performance Standard (NSPS) for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced After November 30, 1999 or for Which Modification or Reconstruction is Commenced on or After June 1, 2001, 40 CFR 60, Subpart CCCC (4C) (326 IAC 12), are not included in the permit for wood-fired boilers (BOILER1, BOILER2, or BOILER3), as follows:
- (A) The wood-fired boilers (BOILER1, BOILER2, and BOILER3) each do not meet the definition of a new incineration unit, as defined under 40 CFR 60.2015. BOILER1, BOILER2, and BOILER3 were initially constructed in 1983, 1990, and 1996, respectively, before the rule applicability date of June 4, 2010, and these units have never been modified.
- (B) The wood-fired boilers (BOILER1, BOILER2, and BOILER3) each do not meet the definition of a commercial and industrial solid waste incineration (CISWI) unit, as defined under 40 CFR 60.2265, in that each unit is not a furnace used in the process of combusting solid waste (refuse), as defined under 40 CFR 241, for the purpose of reducing the volume of the waste by removing combustible matter, but instead each unit only combusts wood chips generated from "clean wood" (*see the "Potential to Emit After Issuance - PSD Minor Source Status" Section above for more detail*) specifically for the purposes of energy recovery (i.e., to heat water and to create steam for industrial uses).
- (2) The requirements of the New Source Performance Standard (NSPS) for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced After November 30, 1999 or for Which Modification or Reconstruction is Commenced on or After June 1, 2001, 40 CFR 60, Subpart CCCC (4C) (326 IAC 12), are not included in the permit for the diesel fuel-fired boiler (DB1), as follows:
- (A) The diesel fuel-fired boiler (DB1) does not meet the definition of a new incineration unit, as defined under 40 CFR 60.2015. DB1 was initially constructed in 1990, before the rule applicability date of June 4, 2010, and has never been modified.
- (B) The diesel fuel-fired boiler (DB1) does not meet the definition of a commercial and industrial solid waste incineration (CISWI) unit, as defined under 40 CFR 60.2265, in that the unit is not a furnace used in the process of combusting solid waste (refuse), as defined under 40 CFR 241, for the purpose of reducing the volume of the waste by removing combustible matter, but instead the unit only combusts diesel fuel specifically for the purposes of energy recovery (i.e., to heat water and to create steam for industrial uses).

- (m) 40 CFR 60, Subpart DDDD - Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units
- (1) The requirements of the Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units, 40 CFR 60, Subpart DDDD (4D) (326 IAC 12), are not included in the permit for wood-fired boilers (BOILER1, BOILER2, or BOILER3), as follows:
- (A) The wood-fired boilers (BOILER1, BOILER2, and BOILER3) each do not meet the definition of a new incineration unit, as defined under 40 CFR 60.2015. BOILER1, BOILER2, and BOILER3 were initially constructed in 1983, 1990, and 1996, respectively, before the rule applicability date of June 4, 2010, and these units have never been modified.
- (B) The wood-fired boilers (BOILER1, BOILER2, and BOILER3) each do not meet the definition of a commercial and industrial solid waste incineration (CISWI) unit, as defined under 40 CFR 60.2265, in that each unit is not a furnace used in the process of combusting solid waste (refuse), as defined under 40 CFR 241, for the purpose of reducing the volume of the waste by removing combustible matter, but instead each unit only combusts wood chips generated from "clean wood" (see the "Potential to Emit After Issuance - PSD Minor Source Status" Section above for more detail) specifically for the purposes of energy recovery (i.e., to heat water and to create steam for industrial uses).
- (2) The requirements of the Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units, 40 CFR 60, Subpart DDDD (4D) (326 IAC 12), are not included in the permit for the diesel fuel-fired boiler (DB1), as follows:
- (A) The diesel fuel-fired boiler (DB1) does not meet the definition of a new incineration unit, as defined under 40 CFR 60.2015. DB1 was initially constructed in 1990, before the rule applicability date of June 4, 2010, and has never been modified.
- (B) The diesel fuel-fired boiler (DB1) does not meet the definition of a commercial and industrial solid waste incineration (CISWI) unit, as defined under 40 CFR 60.2265, in that the unit is not a furnace used in the process of combusting solid waste (refuse), as defined under 40 CFR 241, for the purpose of reducing the volume of the waste by removing combustible matter, but instead the unit only combusts diesel fuel specifically for the purposes of energy recovery (i.e., to heat water and to create steam for industrial uses).
- (n) 40 CFR 60, Subpart EEEE - NSPS for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006
- (1) The requirements of the New Source Performance Standards for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006, 40 CFR 60, Subpart EEEE (4E) (326 IAC 12), are not included in this permit for wood-fired boilers (BOILER1, BOILER2, and BOILER3), as follows:
- (A) Each wood-fired boiler (BOILER1, BOILER2, and BOILER3) has a maximum charging capacity of less than 35 tons per day, as follows:
- Maximum charging capacity* = (Maximum Heat Input Rate (MMBtu/hr) / Higher Heating Value of wood fuel (MMBtu/ton)) * maximum number of hours/day

$$\text{BOILER1} = \frac{10.0 \text{ MMBtu/hr}}{16.0 \text{ MMBtu/ton}} * 24 \text{ hrs/day} = 15.0 \text{ tons/day.}$$

$$\text{BOILER2} = \frac{18.4 \text{ MMBtu/hr}}{16.0 \text{ MMBtu/ton}} * 24 \text{ hrs/day} = 27.6 \text{ tons/day.}$$

$$\text{BOILER3} = \frac{20.1 \text{ MMBtu/hr}}{16.0 \text{ MMBtu/ton}} * 24 \text{ hrs/day} = 30.2 \text{ tons/day.}$$

- (B) BOILER1, BOILER2, and BOILER3 each do not meet the definition of a municipal waste combustion unit, as defined under § 60.1465, since each unit will only combust wood chips generated from "clean wood" (see the "Potential to Emit After Issuance - PSD Minor Source Status" section above for more detail), and not municipal solid waste or municipal-type solid waste, specifically for the purposes of energy recovery (i.e., to heat water and to create steam for industrial uses).
- (2) The requirements of the New Source Performance Standards for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006, 40 CFR 60, Subpart EEEE (4E) (326 IAC 12), are not included in this permit for the diesel fuel-fired boiler (DB1), since DB1 does not meet the definition of a municipal waste combustion unit, as defined under § 60.1465, since the unit will only combust diesel fuel, and not municipal solid waste or municipal-type solid waste, specifically for the purposes of energy recovery (i.e., to heat water and to create steam for industrial uses).
- (o) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (p) 40 CFR 63, Subpart T - NESHAPs for Halogenated Solvent Cleaning
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit for the cold cleaner degreaser, since although the source uses a cold cleaning machine, as defined under 40 CFR 63.461, it does not use any solvent containing methylene chloride, perchlorethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.
- (q) 40 CFR 63 Subpart JJ - NESHAPs for Wood Furniture Manufacturing
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (2J) (326 IAC 20-14), are not included in the permit, since although this source manufactures wood furniture components, such as wood cabinet doors, as defined in 40 CFR 63.801, it is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2.
- (r) 40 CFR 63, Subpart EEE- NESHAPs for Hazardous Air Pollutants From Hazardous Waste Combustors
(1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Hazardous Waste Combustors, 40 CFR 63, Subpart EEE (326 IAC 20-28), are not included in the permit for the wood-fired boilers (BOILER1, BOILER2, and BOILER3), since each boiler does not meet the definition of a hazardous waste combustor, as defined under § 63.1201, because each unit will only combust wood chips generated from "clean wood" (see the "Potential to Emit After Issuance - PSD Minor Source Status" section above for more detail), and not solid waste, as defined under 40 CFR 261.2, or hazardous waste, as defined under 40 CFR 63.1201 (40 CFR 261.3).

- (2) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Hazardous Waste Combustors, 40 CFR 63, Subpart EEE (3E) (326 IAC 20-28), are not included in the permit for diesel fuel-fired boiler (DB1), since the boiler does not meet the definition of a hazardous waste combustor, as defined under § 63.1201, because the unit will only combust diesel fuel, and not solid waste, as defined under 40 CFR 261.2, or hazardous waste, as defined under 40 CFR 63.1201 (40 CFR 261.3).
- (s) 40 CFR 63, Subpart DDDD - NESHAPs for Plywood and Composite Wood Products
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD (4D), are still not included in the permit, since this source does not manufacture plywood or composite wood products, as defined under 40 CFR 63.2292, and is not a major source of HAPs, as defined under 40 CFR 63.2;
- (t) The following National Emission Standards for Hazardous Air Pollutants are not included in the permit for the automated surface coating line (SC-1), low-pressure airless spray guns (GREENSHED and STENCIL), or the aerosol spray coating operation (AEROSOL), since this source applies coatings to wood and not automobiles/light duty trucks, miscellaneous metal parts, large appliances, miscellaneous plastic parts, or metal furniture, and this source is not a major source of HAPs, as defined under 40 CFR 63.2:
- (1) 40 CFR 63, Subpart IIII - NESHAPs: Coating of Automobiles and Light-Duty Trucks (326 IAC 20-85).
- (2) 40 CFR 63, Subpart MMMM - NESHAPs for Surface Coating of Miscellaneous Metal Parts and Products (326 IAC 20-80).
- (3) 40 CFR 63, Subpart NNNN - NESHAPs: Surface Coating of Large Appliances (326 IAC 20-63); or
- (4) 40 CFR 63, Subpart PPPP - NESHAPs for Surface Coating of Plastic Parts and Products (326 IAC 20-81).
- (5) 40 CFR 63, Subpart RRRR - NESHAPs: Surface Coating of Metal Furniture (326 IAC 20-78).
- (u) 40 CFR 63, Subpart QQQQ - NESHAPs for Surface Coating of Wood Building Products
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (4Q) (326 IAC 20-79), are not included in the permit, since although this source applies surface coatings to wood building products, the source is not a major source of hazardous air pollutants (HAPs) emissions, is not located at a major source of HAPs, and is not part of a major source of HAPs, as defined in 40 CFR 63.4681(b).
- (v) 40 CFR 63, Subpart DDDDD - NESHAPs for Industrial, Commercial, and Institutional Boilers, and Process Heaters
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 (5D) (326 IAC 20-95), are not included in the permit, since this source is not a major source of HAPs, and is not located at, nor is a part of, a major source of HAP emissions.
- (w) 40 CFR 63, Subpart CCCCC - NESHAP for the Source Category Identified as Gasoline Dispensing Facilities (GDF)
(1) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCC (6C), because the gasoline dispensing facility (GDF) is a gasoline fuel transfer and dispensing

operation capable of handling less than or equal to 1,300 gallons per day, and a total maximum storage capacity equal to or less than 10,500 gallons.

The gasoline fuel transfer and dispensing operation subject to this rule includes:

- One (1) gasoline dispensing facility (GDF), constructed in 1983 and permitted in 2016, having a maximum storage capacity of 500 gallons, filling storage tanks having a maximum capacity equal to or less than 10,500 gallons, and dispensing less than 300 gallons per month.

Therefore, the gasoline dispensing facility (GDF) is subject to the following portions of Subpart CCCCCC (6C) (included as Attachment C of the permit), with an initial compliance date of January 10, 2011:

- | | | | |
|-----|---|------|----------------------|
| (1) | 40 CFR 63.11110. | (7) | 40 CFR 63.11125(d). |
| (2) | 40 CFR 63.11111(a), (b), (e), (f), (h), (i), and (j). | (8) | 40 CFR 63.11126(b). |
| (3) | 40 CFR 63.11112(a), and (b). | (9) | 40 CFR 63.11130. |
| (4) | 40 CFR 63.11113(a), and (a)(1). | (10) | 40 CFR 63.11131. |
| (5) | 40 CFR 63.11115. | (11) | 40 CFR 63.11132; and |
| (6) | 40 CFR 63.11116. | (12) | Table 3. |

Note: There are no testing requirements applicable to this source for this NESHAP.

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

This is a new requirement to the source.

- (2) The requirements of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC (6C) (326 IAC 20), are not included in the permit for the diesel dispensing facility (DDF), since although this existing source meets the definition of an area source, as defined in 40 CFR § 63.2, the material being dispensed in the DFD does not meet the definition of gasoline, as defined in §63.11132. This source is dispensing diesel fuel, which has a Reid vapor pressure of 1.38 kilopascals, and not gasoline, which has a Reid vapor pressure of 27.6 kilopascals.
- (x) 40 CFR 63, Subpart HHHHHH - NESHAP Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH (6H), are not included in the permit for the automated surface coating line (SC-1), low-pressure airless spray guns (GREENSHED and STENCIL), or the aerosol spray coating operation (AEROSOL), since although this existing source meets the definition of an area source, as defined in 40 CFR 63.2, and uses spray application methods to apply coatings, this source does not:
- (1) apply coatings that contain chromium, lead, manganese, nickel, or cadmium;
 - (2) apply coatings to metal or plastic;
 - (3) coat or refinish auto bodies; or

- (4) include a paint stripping operation utilizing chemical strippers containing methylene chloride.

(y) 40 CFR 63, Subpart JJJJJJ - NESHAPs for Industrial, Commercial, and Institutional Boilers Area Sources

- (1) The wood-fired boilers (BOILER1, BOILER2, and BOILER3), and the diesel fuel-fired boiler (DB1), are each subject to the National Emission Standards for Hazardous Air Pollutants for the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), since this existing source is an area source of hazardous air pollutants (HAP), as defined in §63.2, and since it combusts clean, dry, untreated wood chips in BOILER1, BOILER2, and BOILER3, and diesel fuel oil in DB1.

The units subject to this rule include the following:

- One (1) wood-fired boiler, identified as BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 10.0 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S1.
- One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.
- One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.

The wood-fired boilers (BOILER1, BOILER2, and BOILER3) are each subject to the following applicable portions of Subpart JJJJJJ (6J) (included as Attachment B of the permit), with compliance dates of January 20, 2014 (*initial notification*) and March 21, 2014 (*energy assessment and tune-up*):

- | | | | |
|-----|---|-----|--|
| (A) | 40 CFR 63.11193. | (K) | 40 CFR 63.11225(b), (b)(1), (b)(2), |
| (B) | 40 CFR 63.11194(a), (a)(1), (b), and (f). | | (b)(2)(i), (b)(2)(iii), and (b)(3). |
| (C) | 40 CFR 63.11196(a), (a)(1), and (a)(3). | (L) | 40 CFR 63.11225(c), (c)(1), (c)(2), (c)(2)(i), (c)(2)(iii), (c)(4), (c)(5), (c)(6), and (d). |
| (D) | 40 CFR 63.11200(b). | | |
| (E) | 40 CFR 63.11201(a), (b), and (d). | (M) | 40 CFR 63.11235; |
| (F) | 40 CFR 63.11205(a). | (N) | 40 CFR 63.11236; |
| (G) | 40 CFR 63.11210(c). | (O) | 40 CFR 63.11237; |
| (H) | 40 CFR 63.11214(b). | (P) | Table 2 (items 6 and 16); and |
| (I) | 40 CFR 63.11223(a). | (Q) | Table 8. |
| (J) | 40 CFR 63.11225(a), (a)(1), (a)(2), (a)(4), (a)(4)(i), (a)(4)(ii), (a)(4)(iii), (a)(4)(vi), and (a)(5). | | |

Note: There are no testing requirements applicable to this source for this NESHAP.

The requirements of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1, apply to the wood-fired boilers (BOILER1, BOILER2, and BOILER3) except as otherwise specified in 40 CFR 63, Subpart JJJJJJ.

This is a new requirement to the source.

- (2) The diesel fuel-fired boiler (DB1), is subject to the National Emission Standards for Hazardous Air Pollutants for the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), since this existing source is an area source of hazardous air pollutants (HAP), as defined in §63.2, and since it combusts diesel fuel oil in DB1.

The units subject to this rule includes:

- One (1) diesel fuel-fired boiler, used as a backup boiler, identified as DB1, in service in 1990, with a maximum heat input rate of 4.2 MMBtu/hr, uncontrolled, exhausting outside the building.

The diesel fuel-fired boiler (DB1), is subject to the following applicable portions of Subpart JJJJJJ (6J) (included as Attachment B of the permit), with compliance dates of January 20, 2014 (*initial notification*) and March 21, 2014 (*energy assessment and tune-up*):

- | | |
|--|---|
| (A) 40 CFR 63.11193; | (K) 40 CFR 63.11225(b), (b)(1), (b)(2), |
| (B) 40 CFR 63.11194(a), (a)(1), (b), (f); | (b)(2)(i), (b)(2)(iii), |
| (C) 40 CFR 63.11196(a), (a)(1), (a)(3); | (b)(3); |
| (D) 40 CFR 63.11200(e); | (L) 40 CFR 63.11225(c), (c)(1), (c)(2), |
| (E) 40 CFR 63.11201(b), (c), (d); | (c)(2)(i), (c)(2)(iii), |
| (F) 40 CFR 63.11205(a); | (c)(4), (c)(5), (c)(6), |
| (G) 40 CFR 63.11210(c), (h), (j) (j)(2), (j)(3); | (d), (g); |
| (H) 40 CFR 63.11214(b); | (M) 40 CFR 63.11235; |
| (I) 40 CFR 63.11223(a), (b), (e); | (N) 40 CFR 63.11236; |
| (J) 40 CFR 63.11225(a), (a)(1), (a)(2), | (O) 40 CFR 63.11237; |
| (a)(4), (a)(4)(i), | (P) Table 2 (item 12); and |
| (a)(4)(ii), (a)(4)(iii), | (Q) Table 8. |
| (a)(4)(vi), (a)(5); | |

Note: There are no testing requirements applicable to this source for this NESHAP.

The requirements of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1, apply to the wood-fired boilers (BOILER1, BOILER2, and BOILER3), and the diesel fuel-fired boiler (DB1), except as otherwise specified in 40 CFR 63, Subpart JJJJJJ.

This is a new requirement to the source.

- (z) 40 CFR 63, Subpart QQQQQQ - NESHAPs for Wood Preserving Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Preserving Area Sources, 40 CFR 63, Subpart QQQQQQ (6Q), are not included in the permit, since although this source meets the definition of an area source, as defined in 40 CFR § 63.2, it does not own or operate a wood preserving operation, as defined in §63.11433, in that Cole Hardwood does not perform pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers.

Cole Hardwood applies coatings to the surface of wood; however, no chemicals are impregnated into the wood.

- (aa) There are no other 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

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

Pursuant to 326 IAC 1-5-2, all persons responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant shall prepare, and submit to the commissioner, for approval, written emergency reduction plans consistent with safe operating procedures. This source still has the potential to emit PM, PM10, PM2.5, VOC, and CO of greater than one hundred (100) tons per year, and is consequently still subject to the requirements of 326 IAC 1-5-2.

This is an existing requirement for this source.

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

This source was required to obtain a permit under 326 IAC 2-5.1. Therefore, the requirements of 326 IAC 1-6-3 apply, and are included in the permit. See the "State Rule Applicability - Individual Facilities" section below for more detail.

This is an existing requirement for this source.

- (c) 326 IAC 1-7 (Stack Height)

Stack Height applicability is discussed under the "State Rule Applicability - Individual Facilities" Section below.

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

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

- (e) 326 IAC 2-3 (Emission Offset)

Cass County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, the requirements of 326 IAC 2-3 do not apply and are not included in the permit.

- (f) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This existing source has a potential to emit less than 10 tons per year of any single HAP, and less than 25 tons per year of any combination of HAPs. Therefore, this source is not subject to the requirements of 326 IAC 2-4.1.

See Appendix A.1 for the detailed calculations.

- (g) 326 IAC 2-6 (Emission Reporting)

This existing source, located in Cass County, and not Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2019, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

This is an existing requirement for this source.

(h) 326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

This is an existing requirement for this source.

(i) 326 IAC 5-1 (Opacity Limitations)

This existing source is located in Cass County. Therefore, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall continue to meet the following, unless otherwise stated in this permit:

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

This is an existing requirement for this source.

(j) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), this existing 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.

This is an existing requirement for this source.

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

This existing source, located in Cass County, is not subject to the requirements of 326 IAC 6-5, because the potential to emit fugitive particulate emissions from the entire source are still less than 25 tons per year.

See Appendix A.1 for the detailed calculations.

(l) 326 IAC 6.5 PM Limitations Except Lake County

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

(m) 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.

(n) 326 IAC 12 (New Source Performance Standards)

See the Federal Rule Applicability Section of this TSD.

(o) 326 IAC 20 (Hazardous Air Pollutants)

See the Federal Rule Applicability Section of this TSD.

State Rule Applicability - Individual Facilities

Woodworking Lines: MILL, IDI, and RETAIL

The following units are addressed in this subsection:

- MILL woodworking line, constructed in 1998, having one (1) baghouse for control (BH-1).
- IDI woodworking line, constructed in 1998, having six (6) baghouses (BH-2, BH-3, BH-4, BH-5, and BH-6) for control.
- RETAIL woodworking, constructed in 2011, having one (1) baghouse for control (BH-7).

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

A control device is required to limit particulate emissions (PM, PM10, and PM2.5) from each of the woodworking lines (MILL, IDI, and RETAIL) to less than PSD thresholds, and to assure that MILL, IDI, and RETAIL are exempt from the requirements of 326 IAC 1-7 and 326 IAC 6-3-2. Therefore, a preventive maintenance plan, including the following information, is required for MILL, IDI, and RETAIL and all associated control devices:

- (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.
- (3) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

Preventive maintenance plans shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner.

This is an existing requirement for this source.

(b) 326 IAC 1-7 (Stack Height)

Pursuant to 326 IAC 1-7-1, all sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter and/or sulfur dioxide are emitted are subject to the requirements of 326 IAC 1-7. Potential particulate emissions from each of the woodworking lines MILL and IDI, after consideration of the integral baghouses (BH-1 through BH-6), are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to any of the woodworking lines (MILL, IDI, and RETAIL), and are not included in the permit.

This is a revised requirement for this source.

See Appendix A.1 for the detailed calculations.

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

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the woodworking lines shall not exceed the corresponding pound per hour limitation listed in the table below.

The pounds per hour emission limitations were calculated as follows:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour, or thirty (30) tons per hour, shall be accomplished by use of the equation:

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

And interpolation and extrapolation of the data for process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

However, pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are specifically exempted.

Emission Unit	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	PTE PM after Integral Control (lbs/hour)	326 IAC 6-3 Allowable Emission Rate (lbs/hr)
MILL	16,800	8.4	0.03	exempt*
IDI	92,800	46.4	0.81	43.88
RETAIL	16,800	8.4	0.03	exempt*

*Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pounds per hour are specifically exempted from the requirements of 326 IAC 6-3-2.

- (1) Potential particulate emissions from woodworking line IDI, after consideration of the integral baghouses (BH-2 through BH-6), are less than the 326 IAC 6-3-2 allowable emissions.

In order to assure that woodworking line IDI is in compliance with the requirements of 326 IAC 6-3-2, the integral baghouses (BH-2 through BH-6) serving woodworking line IDI, shall be in operation and control particulate emissions from the woodworking equipment comprising the woodworking line (IDI) at all times that any of the associated woodworking equipment is in operation.

This is a modified requirement for this source.

- (2) Potential particulate emissions from woodworking lines MILL and RETAIL, after consideration of integral baghouses (BH-1 and BH-7) are less than 0.551 lbs/hr, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), woodworking lines MILL and RETAIL are each exempt from the requirements of 326 IAC 6-3.

In order to assure that woodworking lines MILL and RETAIL are exempt from the requirements of 326 IAC 6-3-2, the integral baghouses (BH-1 and BH-7) serving woodworking lines MILL and RETAIL, shall be in operation and control particulate emissions from the woodworking equipment comprising woodworking lines MILL and RETAIL at all times that any of the associated woodworking equipment is in operation.

This is a modified requirement for this source.

See Appendix A.1 for the detailed calculations.

Wood Grinding: CH-HOG, IDI-HOG1, and IDI-HOG2

The following units are addressed in this subsection:

- CH-HOG wood hog grinder, constructed in 1983, using one (1) baghouse (BH-8).

- IDI-HOG1 wood hog grinder, constructed in 1999, using one (1) baghouse (BH-2).
- IDI-HOG2 wood hog grinder, constructed in 2005, using one (1) baghouse (BH-4).

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

A control device is required to limit particulate emissions (PM, PM10, and PM2.5) from each of the wood grinders (CH-HOG, IDI-HOG1, & IDI-HOG2) for compliance with PSD minor source limits. Therefore, a preventive maintenance plan, including the following information, is required for wood grinders CH-HOG, IDI-HOG1, and IDI-HOG2 and all associated control devices:

- (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.
- (3) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

Preventive maintenance plans shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner.

This is a new requirement for this source.

(e) 326 IAC 1-7 (Stack Height)

Pursuant to 326 IAC 1-7-1, all sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter and/or sulfur dioxide are emitted are subject to the stack height provisions in 326 IAC 1-7-3. The uncontrolled particulate emissions from wood grinders CH-HOG, IDI-HOG1, and IDI-HOG2 are 12.88, 71.13, and 142.26 tons per year, respectively.

- (1) The uncontrolled particulate emissions from the wood grinder CH-HOG are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 1-7 do not apply to CH-HOG and are not included in the permit.
- (2) The uncontrolled particulate emissions from the wood grinders IDI-HOG1 and IDI-HOG2 are greater than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 apply to IDI-HOG1 and IDI-HOG2 and are included in the permit.

This is a new requirement for this source.

See Appendix A.1 for the detailed calculations.

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

Potential particulate emissions from wood grinders CH-HOG, IDI-HOG1, and IDI-HOG2 are greater than five hundred fifty-one thousandths (0.551) pounds per hour, each. Therefore, pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the wood grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) shall not exceed the corresponding pound per hour limitation listed in the table below. The emission limitations were calculated as follows:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour, or thirty (30) tons per hour, shall be accomplished by use of the equation:

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

Emission Unit	Process Weight Rate (tons/hr)	Process Weight Rate (lbs/hr)	Uncontrolled Potential Particulate Emissions (lbs/hour)	326 IAC 6-3 Allowable Emission Rate (lbs/hr)
CH-HOG	8.4	16,800	2.94	17.06
IDI-HOG1	46.4	92,800	16.24	43.88
IDI-HOG2	92.8	185,600	32.48	50.33

The uncontrolled potential particulate emissions from each of the wood grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) are less than the particulate limitation (E) for each unit. Therefore, the baghouses (BH-2, BH-4, and BH-8) for particulate control are not needed to comply with these limits.

See Appendix A.1, for the detailed calculations.

This is a new requirement for this source.

Waste Wood, and Ground Wood Conveying and Storage Operations

The following units are addressed in this subsection:

- Wood waste belt conveying systems CH-WWBCS and IDI-WWBCS, constructed in 1983 and 1999, uncontrolled and exhausting outside the building.
- Ground wood conveying, handling, and storage operations, consisting of:
 - CH-GWPCS pneumatic conveying system from CH-HOG to storage silo CH-SILO1, constructed in 1983, equipped with an integral cyclone collector/airlock unit and baghouse for control.
 - IDI-GWPCS1 pneumatic conveying system from IDI-HOG1 to storage silo IDI-SILO1, constructed in 1990, equipped with an integral cyclone collector/airlock unit and baghouse for control.
 - IDI-GWPCS2 pneumatic conveying system from IDI-HOG2 to storage silo IDI-SILO2, constructed in 2005, equipped with an integral cyclone collector/airlock unit and baghouse for control.
 - CH-GWACS auger conveying system from silo CH-SILO1 to BOILER1 and BOILER3, constructed in 1983, uncontrolled and exhausting outside the building.
 - IDI-GWACS auger conveying system from silo IDI-SILO1 to BOILER2, constructed in 1990, uncontrolled and exhausting outside the building.

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

A control device is required for compliance with PSD minor source limits for pneumatic ground wood conveying units: CH-GWPCS, IDI-GWPCS1, and IDI-GWPCS2. Therefore, a preventive maintenance plan, including the following information, is required for wood grinders CH-GWPCS, IDI-GWPCS1, and IDI-GWPCS2 and any associated control devices:

- (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.
- (3) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

Preventive maintenance plans shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner.

This is an existing requirement for this source.

(h) 326 IAC 1-7 (Stack Height)

Pursuant to 326 IAC 1-7-1, all sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter and/or sulfur dioxide are emitted are subject to the requirements of 326 IAC 1-7.

- (1) The uncontrolled particulate emissions from waste wood conveying and handling units CH-WWBCS and IDI-WWBCS are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to CH-WWBCS or IDI-WWBCS, and are not included in the permit.
- (2) The uncontrolled particulate emissions from pneumatic ground wood conveying system CH-GWPCS are 36.79 tons per year. Therefore, the requirements of 326 IAC 1-7 apply to CH-GWPCS and are included in the permit.

This is an existing requirement for this source.

- (3) The uncontrolled particulate emissions, after integral controls, from pneumatic ground wood conveying and handling units IDI-GWPCS1 and IDI-GWPCS2 are 203.23 and 406.46 tons per year, respectively. Therefore, the requirements of 326 IAC 1-7 apply to IDI-GWPCS1 and IDI-GWPCS2 and are included in the permit.

This is an existing requirement for this source.

- (4) The uncontrolled particulate emissions from ground wood auger conveying systems CH-GWACS and IDI-GWACS are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to any of these units, and are not included in the permit.

See Appendix A.1 for the detailed calculations.

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

- (1) Potential particulate emissions from wood waste belt conveying systems CH-WWBCS and IDI-WWBCS are less than 0.551 lbs/hr, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), CH-WWBCS and IDI-WWBCS are each exempt from the requirements of 326 IAC 6-3.
- (2) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the ground wood conveying and storage operations shall not exceed the corresponding pound per hour limitation listed in the table below.

The emission limitations were calculated as follows:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour, or thirty (30) tons per hour, shall be accomplished by use of the equation:

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

And interpolation and extrapolation of the data for process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Operation	Process Weight Rate (tons/hr)	Process Weight Rate (lbs/hr)	Uncontrolled Potential Particulate Emissions (lbs/hr)	326 IAC 6-3 Allowable Emission Rate (lbs/hr)
CH-GWPCS*	8.4	16,800	2.52	17.06
IDI-GWPCS1*	46.4	92,800	13.92	43.88
IDI-GWPCS2*	92.8	185,600	27.84	50.33
CH-GWACS	1.78	3,550	1.78	6.02
IDI-GWACS	1.26	2,513	1.26	4.78
* PTE after consideration of integral cyclone control				

Based on calculations, the potential particulate emissions from CH-GWPCS, IDI-GWPCS1, IDI-GWPCS2, CH-GWACS, and IDI-GWACS, are less than the particulate limitation (E) for each unit. Therefore, a particulate control device is not needed for these units to comply with the associated limits.

See Appendix A.1 for the detailed calculations.

Boilers - Wood-fired Boilers (BOILER1, BOILER2, AND BOILER3) and Diesel Fuel-fired (DB1)

The following units are addressed in this subsection:

- Wood-fired BOILER1, in service in 1985, max. heat input rate = 10.0 MMBtu/hr.
- Wood-fired BOILER2, in service in 1990, max. heat input rate = 18.4 MMBtu/hr.
- Wood-fired BOILER3, in service in 1997, max. heat input rate = 20.1 MMBtu/hr.
- Diesel fuel-fired boiler DB1, in service in 1990, max. heat input rate = 4.2 MMBtu/hr.

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

A control device is required to limit particulate emissions (PM, PM10, and PM2.5) from each of the wood-fired boilers (BOILER1, BOILER2, and BOILER3) for compliance with PSD minor source limits and the particulate emission limits under 326 IAC 6-2. Therefore, a preventive maintenance plan, including the following information, is required for wood grinders CH-HOG, IDI-HOG1, and IDI-HOG2 and all associated control devices:

- (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.
- (3) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

Preventive maintenance plans shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner.

This is an existing requirement for this source.

(k) 326 IAC 1-7 (Stack Height)

Pursuant to 326 IAC 1-7-1, all sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter and/or sulfur dioxide are emitted are subject to the requirements of 326 IAC 1-7.

- (1) The unlimited and uncontrolled potential to emit (PTE) PM10, PM2.5, and SO2 from the BOILER1 stack exhaust are less than twenty-five (25) tons per year, each. Therefore,

the requirements of 326 IAC 1-7 do not apply to BOILER1, and are not included in the permit.

- (2) The unlimited and uncontrolled potential to emit (PTE) PM10, PM2.5, and SO2 from the BOILER2 and BOILER3 stack exhausts are greater than twenty-five (25) tons per year, each. Therefore, BOILER2, and BOILER3 continue to be subject to this rule and requirements are included in the permit.

This is an existing requirement for this source.

- (3) The unlimited and uncontrolled potential to emit (PTE) PM10, PM2.5, and SO2 from the DB1 stack exhaust are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to DB1 and are not included in the permit.

See TSD Appendix A.1 for the detailed calculations.

(l) 326 IAC 4-2-2 (Incinerators)

The requirements of 326 IAC 4-2-2, are not included in the permit for any of the boilers, BOILER1, BOILER2, BOILER3, or DB1, as follows:

- (1) The wood-fired boilers (BOILER1, BOILER2, and BOILER3) are each not an incinerator, as defined by 326 IAC 1-2-34, because the boilers each do not burn any waste substances, but will instead only combust wood chips generated from "clean wood" (See the "Potential to Emit After Issuance - PSD Minor Source Status" Section above for more detail). Therefore, the requirements of 326 IAC 4-2-2 still do not apply to BOILER1, BOILER2, or BOILER3, and are not included in the permit.

In order to render the requirements of 326 IAC 4-2-2 not applicable, the Permittee shall only combust "clean wood" in each of the wood-fired boilers (BOILER1, BOILER2, and BOILER3).

This is an existing requirement for this source.

- (2) The diesel fuel-fired boiler (DB1) is not an incinerator, as defined by 326 IAC 1-2-34, since it does not burn waste substances. Therefore, the requirements of 326 IAC 4-2-2 do not apply to DB1 and are not included in the permit.

(m) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received approval to construct, modify, or reconstruct, after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

Each of the indirect heating units located at this source (BOILER1, BOILER2, BOILER3, and DB1) were constructed, modified, or reconstructed after September 21, 1983. Therefore, the particulate matter emissions (Pt) from BOILER1, BOILER2, BOILER3, and DB1 shall be limited by the equation:

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

Where:

- Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever

is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The particulate matter emissions (Pt) from BOILER1, BOILER2, BOILER3, and DB1, are as follows:

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction/Reconstruction Date	Fuel Combusted	Maximum Operating Capacity (MMBtu/hr)	Q* (MMBtu/hr)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42** (lb/MMBtu)
BOILER1	1985	ground wood	10.0	10.0	0.60	0.56
BOILER2	1990	ground wood	18.4	32.6	0.44	0.56
DB1		diesel fuel	4.2		0.44	0.014
BOILER3	1997	ground wood	20.1	52.7	0.39	0.56
* Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. ** AP 42 emission factors have been used to determine compliance with the particulate emission limitations in this table. Since the AP 42 emission factor for diesel fuel is provided in AP 42 as lbs/kgal of fuel, it has been converted to lbs/MMBtu to allow for comparison. 1 kgal of diesel fuel has a heating value of 140 MMBtu. Therefore, $2.0 \text{ lbs PM} / 1 \text{ kgal} * 1 \text{ kgal} / 140 \text{ MMBtu} = 0.014 \text{ lbs/MMBtu}$						

- (1) Based on the uncontrolled potential to emit of PM, BOILER1 is able to comply with this limit without the use of a control.

This is a revised requirement for this source.

- (2) Based on the uncontrolled potential to emit of PM, a control device is needed for BOILER2 and BOILER3 to comply with this limit. The multiclones for particulate control shall be in operation and control emissions from wood-fired boilers BOILER2 and BOILER3, at all times that BOILER2 and BOILER3 are in operation in order to comply with these limits.

This is an existing requirement for this source.

- (3) The diesel-fired boiler DB1 was placed in service in 1990, the same year as BOILER2 (previously ID EU01-2). Therefore, Q for DB1 is the same as Q for BOILER2. Therefore, the particulate limitation should be 0.44 lb/MMBtu and not 0.55 lb/MMBtu as listed in permit No. T017-29073-00028. This has been corrected. Based on the uncontrolled potential to emit of PM, DB1 is able to comply with this limit without the use of a control

This is a revised requirement for this source.

See TSD Appendix A.1 for the detailed calculations.

- (n) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 BOILER1, BOILER2, and BOILER3, and DB1, are each not subject to the requirements of 326 IAC 6-3, since liquid and gaseous fuels and combustion air are not considered as part of the process weight (326 IAC 1-2-59), and combustion for indirect heating is specifically exempted under 326 IAC 6-3-1(b)(1). Therefore, the requirements of 326 IAC 6-3-2 do not apply to BOILER1, BOILER2, and BOILER3, or DB1, and are not included in the permit.

- (o) 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The unlimited and uncontrolled potential to emit (PTE) SO₂ from BOILER1, BOILER2, and BOILER3, and DB1 is less than twenty-five (25) tons per year, or 10 pounds/hour, each. Therefore, the requirements of 326 IAC 7-1.1 do not apply to Boilers B-1, B-2, or B-3, and are not included in the permit.

See TSD Appendix A.1 for the detailed calculations.

- (p) 326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from BOILER1, BOILER2, and BOILER3, and DB1, are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 8-1-6 do not apply to BOILER1, BOILER2, and BOILER3, or DB1, and are not included in the permit.

See TSD Appendix A.1 for the detailed calculations.

- (q) 326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 are not included in the permit for BOILER1, BOILER2, and BOILER3, or DB1 because this existing stationary sawing and surface coating of green, and kiln-dried lumber, and a lumber wholesale operation source does not operate any catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment. Additionally, the wood-fired boilers each do not qualify as a refuse incinerator or refuse burning equipment, since the units will only combust wood chips generated from "clean wood" (*see the "Potential to Emit After Issuance - PSD Minor Source Status" and Federal Rule Applicability sections above for more detail*).

- (r) 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
BOILER1, BOILER2, and BOILER3, or DB1, are each not subject to the requirements of 326 IAC 10-3, because each boiler is not a blast furnace gas-fired boiler, a Portland cement kiln, or any facility specifically listed under 326 IAC 10-3-1(a)(2).

Surface Coating Operations: SC-1, STENCIL, GREENSHED, Aerosol Spray Coating, and Adhesive

The following units are addressed in this subsection:

- Automated surface coating line SC-1, constructed in 2008, using high volume low pressure (HVLP) spray guns, and dry filters for particulate control.
- Low-pressure airless spray guns GREENSHED, constructed in 1998.
- Low-pressure airless spray gun STENCIL, constructed in 1998.
- Hand-held aerosol spray coating operation AEROSOL, permitted in 2016.
- Gluing operation ADHESIVE, permitted in 2016, using water-based wood adhesives ≤ 5% by volume of VOCs excluding HAPs.

- (s) 326 IAC 1-6-3 (Preventive Maintenance Plan)
A control device is required to limit particulate emissions (PM, PM₁₀, and PM_{2.5}) from the automated surface coating line SC-1 for compliance with the requirements of 326 IAC 6-3. Additionally, following work practices has the effect of reducing emissions from all surface coating operations. Therefore, a preventive maintenance plan, including the following information, is required for SC-1, GREENSHED, and STENCIL, and any associated control device(s):

- (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.

- (3) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

Preventive maintenance plans shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner.

This is an existing requirement for this source.

(t) 326 IAC 1-7 (Stack Height)

Pursuant to 326 IAC 1-7-1, all sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter and/or sulfur dioxide are emitted are subject to the requirements of 326 IAC 1-7. The uncontrolled potential to emit PM, PM10, and PM2.5, from automated surface coating line SC-1, two (2) low-pressure airless spray guns (GREENSHED), one (1) low-pressure airless spray gun (STENCIL), hand-held aerosol spray coating operation (AEROSOL), and the gluing operation (ADHESIVE), is less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to SC-1, GREENSHED, STENCIL, AEROSOL, or ADHESIVE, and are not included in the permit.

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

Pursuant to 326 IAC 6-3-1(b)(15), surface coating manufacturing processes, not otherwise exempt under subdivisions (5) through (8), that use more than five (5) gallons of surface coatings, as defined under 326 IAC 6-3-1.5, per day are subject to the requirements of 326 IAC 6-3-2(d).

- (1) The automated surface coating line (SC-1) has the potential to apply more than five (5) gallons of surface coatings, as defined under 326 IAC 6-3-1.5, per day using air-assisted airless spray application methods. Therefore, the requirements of 326 IAC 6-3-2(d) apply to SC-1, as follows:

Pursuant to 326 IAC 6-3-2(d), particulate emissions from SC-1 shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

This is an existing requirement for this source.

- (2) The two (2) low-pressure airless spray guns (GREENSHED) (formerly EU03-2), have the potential to apply more than five (5) gallons of surface coatings, as defined under 326 IAC 6-3-1.5, per day using low-pressure airless spray application methods. Therefore, the requirements of 326 IAC 6-3-2(d) apply to GREENSHED, as follows:

Pursuant to 326 IAC 6-3-2(d) particulate emissions from the two (2) low-pressure airless spray guns (GREENSHED) shall be controlled using the following equivalent control methods (work practices):

The Permittee shall:

- (A) Spray coat only wood and wood derived materials.
- (B) Operate the coating operation inside the building.
- (C) Use applicators with tips and pressures that do not atomize spray.
- (D) Spray no further than 36" from the coating surface.
- (E) Maintain and operate the spray application equipment in accordance with the manufacturer's recommendations.
- (F) Install overspray controls if accumulations of overspray are observed anywhere on the building or grounds outside the building.

This is a revised requirement for this source.

- (3) The low-pressure airless spray gun (STENCIL) (formerly EU03-1), has the potential to apply more than five (5) gallons of surface coatings, as defined under 326 IAC 6-3-1.5, per day using low-pressure airless spray application methods. Therefore, the requirements of 326 IAC 6-3-2(d) apply to STENCIL, as follows:

Pursuant to 326 IAC 6-3-2(d) particulate emissions from the low-pressure airless spray gun (STENCIL) shall be controlled using the following equivalent control methods (work practices):

The Permittee shall:

- (A) Spray coat only wood and wood derived materials.
- (B) Operate the coating operation inside the building.
- (C) Use applicators with tips and pressures that do not atomize spray.
- (D) Spray no further than 36" from the coating surface.
- (E) Maintain and operate the spray application equipment in accordance with the manufacturer's recommendations.
- (F) Install overspray controls if accumulations of overspray are observed anywhere on the building or grounds outside the building.

This is a revised requirement for this source.

- (4) The hand-held aerosol spray coating operation (AEROSOL), is not subject to 326 IAC 6-3, since it has the potential to use less than five (5) gallons of surface coatings per day using aerosol spray can application methods. Therefore, the requirements of 326 IAC 6-3-2 are not included in the permit for AEROSOL.

Note: Pursuant to 326 IAC 6-3-2(d)(4), if at any time the coating application rate for the hand-held aerosol spray coating operation (AEROSOL) increases to greater than five (5) gallons per day, the Permittee shall comply with the requirements of 326 IAC 6-3-2. A manufacturing process that is subject to this subsection shall remain subject to it notwithstanding any subsequent decrease in gallons of coating used.

- (5) The gluing operation (ADHESIVE), is not subject to 326 IAC 6-3, since surface coating operations using roll, flow, and brush application methods are exempted under 326 IAC 6-3-1(b)(6) through (8). Therefore, the requirements of 326 IAC 6-3-2 are not included in the permit for ADHESIVE.

(v) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

This existing stationary hardwood concentration yard and wholesale operation, and wood dimensions, panels, moldings, and cabinet components manufacturing and surface coating source, is located in Cass County. The applicability of this rule to the surface coating operations is as follows:

- (1) The automated surface coating line (SC-1), constructed in 2008, has VOC potential emissions of twenty-five (25) tons or more per year. However, since SC-1 is used to apply coatings to wood cabinet components, it is otherwise regulated by the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Therefore, the requirements of 326 IAC 8-1-6 do not apply to SC-1, and are not included in the permit.

- (2) The two (2) low-pressure airless spray guns (GREENSHED), one (1) low-pressure airless spray gun (STENCIL), hand-held aerosol spray coating operation (AEROSOL), and the gluing operation (ADHESIVE), have potential VOC emissions of less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 8-1-6 do not apply to GREENSHED, STENCIL, AEROSOL, or ADHESIVE, and are not included in the permit.
- (w) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
This existing stationary hardwood concentration yard and wholesale operation, and wood dimensions, panels, moldings, and cabinet components manufacturing and surface coating source is located in Cass County. Additionally, the automated surface coating line (SC-1), two (2) low-pressure airless spray guns (GREENSHED), one (1) low-pressure airless spray gun (STENCIL), hand-held aerosol spray coating operation (AEROSOL), and the gluing operation (ADHESIVE), are each used to apply miscellaneous coatings and adhesives to wood construction materials under the Standard Industrial Classification Code 2511: Wood Household Furniture, Except Upholstered. Therefore, since the source is not located in Lake County or Porter County and does not perform surface coating of metal and/or plastic under any of the categories listed under 326 IAC 8-2-9(a)(1), the requirements of 326 IAC 8-2-9 do not apply to SC-1, GREENSHED, STENCIL, AEROSOL, or ADHESIVE, and are not included in the permit.
- (x) 326 IAC 8-2-10 (Flat wood panels; manufacturing operations)
This existing stationary hardwood concentration yard and wholesale operation, and wood dimensions, panels, moldings, and cabinet components manufacturing and surface coating source, is located in Cass County and has VOC potential emissions of 54.58 tons/yr. However, this source applies miscellaneous coatings and adhesives to solid wood panels, moldings and cabinet components and not printed interior panels made of hardwood plywood and thin particle board, natural finish hardwood plywood panels, hardboard paneling, exterior siding, or tileboard, as defined under 326 IAC 8-2-10(a)(1) through (a)(5). Therefore, the requirements of 326 IAC 8-2-10 do not apply to SC-1, GREENSHED, STENCIL, AEROSOL, or ADHESIVE, and are not included in the permit.
- (y) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
This existing stationary hardwood concentration yard and wholesale operation, and wood dimensions, panels, moldings, and cabinet components manufacturing and surface coating source, is located in Cass County. The applicability of this rule to the surface coating operations is as follows:
- (1) The automated surface coating line SC-1 was constructed in 2008, after the applicability date of July 1, 1990, and has potential and actual emissions greater than fifteen (15) pounds of VOC per day. Furthermore, SC-1 is used to apply coatings to wood cabinet components. Therefore, pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the automated surface coating line SC-1, the Permittee shall perform the surface coating of wood furniture, wood cabinets, and components of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:
- Airless Spray Application
 - Air Assisted Airless Spray Application
 - Electrostatic Spray Application
 - Electrostatic Bell or Disc Application
 - Heated Airless Spray Application
 - Roller Coating
 - Brush or Wipe Application
 - Dip-and-Drain Application
- High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air

pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (2) The two (2) low-pressure airless spray guns (GREENSHED), one (1) low-pressure airless spray gun (STENCIL), and hand-held aerosol spray coating operation (AEROSOL), constructed in 2008, after the applicability date of July 1, 1990, are used to apply coatings to hardwood lumber and dimensions, not wood furnishings, cabinets, or cabinet components, and each have potential and actual emissions of less than fifteen (15) pounds of VOC per day. Therefore, the requirements of 326 IAC 8-2-12 do not apply to GREENSHED, STENCIL, or AEROSOL, and are not included in the permit.
- (3) The gluing operation (ADHESIVE) consists of applying glue/adhesive coatings necessary for the assembly of solid wood panels, moldings, and cabinet components, but does not include applying stains or other coatings to the panels, moldings, or cabinet components. The Control Techniques Guidelines (CTG) for the Control of VOC Emissions from Wood Furniture Manufacturing Operations, the document used to develop this rule, provides clarification on this issue (http://www.epa.gov/airquality/ozonepollution/SIPToolkit/ctg_act/199604_voc_epa453_r-96-007_wood_furniture_manufacturing.pdf). On page 2-20 and 2-21, it says:

"The VOC emissions from a wood furniture manufacturing facility resulting from operations other than finishing, cleaning, and washoff are not covered by the CTG for wood furniture coating. For example, if a wood furniture manufacturing facility is involved in gluing operations, the CTG would not apply to VOC emissions from the gluing operations."

Therefore the requirements of 326 IAC 8-2-12 do not apply to the gluing operation (ADHESIVE), and are not included in the permit.

- (z) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The miscellaneous solvent cleanup activities that occur in the automated surface coating line (SC-1), two (2) low-pressure airless spray guns (GREENSHED), one (1) low-pressure airless spray gun (STENCIL), hand-held aerosol spray coating operation (AEROSOL), and the gluing operation (ADHESIVE), are not of a type described in subdivisions in 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C). Therefore, 326 IAC 8-3-2 does not apply to the cleanup solvent usage in SC-1, GREENSHED, STENCIL, AEROSOL, or ADHESIVE, and the requirements are not included in the permit.
- (aa) 326 IAC 8-6 (Organic Solvent Emission Limitations)
This existing stationary hardwood concentration yard and wholesale operation, and wood furniture manufacturing and surface coating source is located in Cass County. Although the source-wide VOC potential emissions are greater than 100 tons (90.7 megagrams) per year, the automated surface coating line (SC-1), two (2) low-pressure airless spray guns (GREENSHED), one (1) low-pressure airless spray gun (STENCIL), hand-held aerosol spray coating operation (AEROSOL), and the gluing operation (ADHESIVE), were added in 2008, after the applicability date of January 1, 1980, and the automated surface coating line (SC-1) is subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Therefore, the requirements of 326 IAC 8-6-1 (Organic Solvent Emission Limitations) do not apply and are not included in the permit.
- (bb) 326 IAC 8-11 (Volatile Organic Compounds; Wood Furniture Coatings)
This existing stationary hardwood concentration yard and wholesale operation, and wood furniture manufacturing and surface coating source is located in Cass County, and not Lake, Porter, Clark, or Floyd Counties. Therefore, the requirements of 326 IAC 8-11 do not apply and are not included in the permit.

- (cc) There are no other 326 IAC 8 Rules that are applicable to SC-1, GREENSHED, STENCIL, AEROSOL, or ADHESIVE.

Wood-Drying Kilns (KILN1 through KILN20) (process)

The following units are addressed in this subsection:

- Twenty (20) wood-drying kilns (KILN1 through KILN20), heated with steam from the wood-fired boilers (BOILER1, BOILER2, and BOILER3):
 - KILN1 through KILN4, constructed in 1989 and permitted in 2016.
 - KILN5 through KILN8, constructed in 1978 and permitted in 2016.
 - KILN9 through KILN12, constructed in 1999 and permitted in 2016.
 - KILN13 through KILN16, constructed in 1991 and permitted in 2016; and
 - KILN17 through KILN20, constructed in 1993 and permitted in 2016.
- (dd) 326 IAC 1-7 (Stack Height)
Pursuant to 326 IAC 1-7-1, all sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter and/or sulfur dioxide are emitted are subject to the requirements of 326 IAC 1-7. The unlimited and uncontrolled potential to emit (PTE) PM and SO₂ from the wood-drying kilns (KILN1 through KILN20) are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply to any of the kilns, and are not included in the permit.
- (ee) 326 IAC 4-2-2 (Incinerators)
The wood-drying kilns (KILN1 through KILN20) are each not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. The kilns receive steam from the wood-fired boilers (BOILER1, BOILER2, and BOILER3), which only combust ground wood (sawdust) generated from "clean wood" (See the "State Rule Applicability - Individual Facilities - Boilers - Wood-fired Boilers (BOILER1, BOILER2, AND BOILER3) and Diesel Fuel-fired (DB1)" section above for more detail). Therefore, the requirements of 326 IAC 4-2-2 do not apply to any of the kilns, and are not included in the permit.
- (ff) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The wood-drying kilns (KILN1 through KILN20), each, do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19, since none of the kilns include a combustion unit, but instead receive steam from the boilers. Therefore, the requirements of 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units) do not apply to any of the kilns, and are not included in the permit.
- (gg) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Potential particulate emissions from the wood-drying kilns (KILN1 through KILN20) are less than five hundred fifty-one thousandths (0.551) pound per hour, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), each kiln is specifically exempted and the requirements are not included in the permit

See Appendix A.1 for the detailed calculations.

- (hh) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited volatile organic compound (VOC) potential emissions from the wood-drying kilns (KILN1 through KILN20) are less than 25 tons per year, each. Therefore, the requirements of 326 IAC 8-1-6 do not apply to any of the kilns, and are not included in the permit.

See Appendix A.1 for the detailed calculations.

- (ii) There are no other 326 IAC 8 Rules that are applicable to the wood-drying kilns (KILN1 through KILN20).

Cold Cleaner Degreaser (DEGREASER)

The following units are addressed in this subsection:

- One (1) cold cleaner degreaser, identified as DEGREASER, constructed in 2004.
- (jj) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The cold cleaner degreaser (DEGREASER) is by its very nature a wet processes, so it is anticipated that particulate emissions would be negligible. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the cold cleaner degreaser (DEGREASER), is exempt from the requirements of 326 IAC 6-3, because potential particulate emissions from the unit are less than five hundred fifty-one thousandths (0.551) pound per hour.
- See TSD Appendix A.1 for the detailed calculations.*
- (kk) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The cold cleaner degreaser (DEGREASER) is otherwise subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply to the cold cleaner degreaser (DEGREASER), and are not included in the permit.
- (ll) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
Pursuant to 326 IAC 8-3-1 (Organic Solvent Degreasing Operations), the cold cleaner degreaser (DEGREASER) is subject to the requirements of 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements) and 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers), because the unit was constructed after the July 1, 1990 and meets the definition of a cold cleaner degreaser under 326 IAC 1-2-18.5, utilizing an organic solvent containing volatile organic compounds (VOCs) (as defined by 326 IAC 1-2-90), that has with an air to solvent interface of one (1) square meter (ten and eight-tenths (10.8) square feet) or greater.
- (mm) 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)
Pursuant to 326 IAC 8-3-2, the Permittee shall:
- (1) Ensure the following control equipment and operating requirements are met:
 - (A) Equip the degreaser with a cover.
 - (B) Equip the degreaser with a device for draining cleaned parts.
 - (C) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (D) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (E) Provide a permanent, conspicuous label that lists the operating requirements in (1)(C), (1)(D), (1)(F), and (1)(G) of this condition.
 - (F) Store waste solvent only in closed containers.
 - (G) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

- (2) Ensure the following additional control equipment and operating requirements are met:
- (A) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
- (i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (ii) A water cover when solvent used is insoluble in, and heavier than, water.
 - (iii) A refrigerated chiller.
 - (iv) Carbon adsorption.
 - (v) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (B) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (C) If used, solvent spray:
- (i) must be a solid, fluid stream; and
 - (ii) shall be applied at a pressure that does not cause excessive splashing.

These are new requirements for this source.

- (nn) 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)
Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015:
- (1) Pursuant to 326 IAC 8-3-8(b)(2), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (2) Pursuant to 326 IAC 8-3-8(c)(2), the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
- (A) The name and address of the solvent supplier.
 - (B) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (C) The type of solvent purchased.
 - (D) The total volume of the solvent purchased.
 - (E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

- (3) Pursuant to 326 IAC 8-3-8(d), all records required by 326 IAC 8-3-8(c)(2) shall be:
- (A) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
 - (B) reasonably accessible for an additional two (2) year period.

These are new requirements for this source.

- (oo) 326 IAC 8-6-1 (Organic Solvent Emission Limitations)
This existing stationary hardwood concentration yard and wholesale operation, and wood furniture manufacturing and surface coating source is located in Cass County. Although the source-wide VOC potential emissions are greater than 100 tons (90.7 megagrams) per year, the cold cleaner degreaser (DEGREASER), was added in 2004, after the applicability date of January 1, 1980, and the cold cleaner degreaser (DEGREASER) is subject to the requirements of 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements) and 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers). Therefore, the requirements of 326 IAC 8-6-1 (Organic Solvent Emission Limitations) do not apply and are not included in the permit.
- (pp) There are no other 326 IAC 8 Rules that are applicable to the cold cleaner degreaser (DEGREASER).

Ash Handling (AHD)

The following units are addressed in this subsection:

- Ash handling and disposal operations, identified as AHD, consisting of a hand rake, wheelbarrow, front loader and dump truck, with a maximum throughput of 0.30 tons of ash per hour, uncontrolled, and exhausting partly inside and partly outside the building.

- (qq) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The potential particulate emissions from the ash handling and disposal operations (AHD) are less than 0.551 lbs/hr. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the AHD operations are exempt from the requirements of 326 IAC 6-3.

See TSD Appendix A.1 for the detailed calculations.

Sawdust Handling (SHD)

The following units are addressed in this subsection:

- Sawdust handling, identified as SHD, consisting of telescoping chutes, hand raking, wheelbarrows, front end loaders, and dump trucks, with a maximum throughput of 20 tons of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the building.

- (rr) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The potential particulate emissions from the sawdust handling operations (SHD) are less than 0.551 lbs/hr. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the SHD are exempt from the requirements of 326 IAC 6-3.

See TSD Appendix A.1 for the detailed calculations.

Fuel Dispensing and Storage Facilities (GDF and DDF)

The following units are addressed in this subsection:

- Gasoline dispensing facility (GDF), constructed in 1983, having a maximum storage capacity of 500 gallons, filling storage tanks having a maximum capacity equal to or less than 10,500 gallons, and dispensing less than 300 gallons per month.
 - Diesel dispensing facility (DDF), constructed in 1979, having a storage capacity of 5,000 gallons, and dispensing less than 1,800 gallons per month.
- (ss) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))
A PMP is required for this unit and any associated control devices.
- (tt) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
See the "State Rule Applicability - Entire Source" section of this TSD.
- (uu) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
(1) The requirements of 326 IAC 8-1-6 do not apply to the gasoline dispensing facility (GDF) or the associated gasoline storage tank, since the unlimited VOC potential emissions, combined, are less than twenty-five (25) tons per year. Therefore, the requirements are not included in the permit.

See Appendix A.1 for the detailed calculations.
(2) The requirements of 326 IAC 8-1-6 do not apply to the diesel dispensing facility (DDF) or the associated diesel fuel storage tank, since unlimited VOC potential emissions, combined, are less than twenty-five (25) tons per year. Therefore, the requirements are not included in the permit.

See Appendix A.1 for the detailed calculations.
- (vv) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
(1) The requirements of 326 IAC 8-4-3 do not apply to the gasoline dispensing facility (GDF), since the associated gasoline storage tank has a maximum storage capacity of less than 39,000 gallons (150,000 liters). Therefore, the requirements of 326 IAC 8-4-3 are not included in the permit for this unit.
(2) The requirements of 326 IAC 8-4-3 do not apply to the diesel dispensing facility (DDF), since the associated diesel fuel storage tank has a maximum storage capacity of less than 39,000 gallons (150,000 liters), and the liquid stored in the tank has a true vapor pressure of less than 10.5 kPa (1.52 psi). Therefore, the requirements of 326 IAC 8-4-3 are not included in the permit for this unit.
- (ww) 326 IAC 8-4-4 Bulk gasoline terminals
(1) The requirements of 326 IAC 8-4-4 do not apply to the gasoline fuel dispensing facility (GFDF), since the GDF does not meet the definition of a Bulk gasoline terminal, under 326 IAC 1-2-8, or a Bulk gasoline plant, under 326 IAC 1-2-7. Therefore, the requirements of 326 IAC 8-4-4 are not included in the permit.
(2) The requirements of 326 IAC 8-4-4 do not apply to the diesel dispensing facility (DDF), since the DDF does not meet the definition of a Bulk gasoline terminal, under 326 IAC 1-2-8, or a Bulk gasoline plant, under 326 IAC 1-2-7. Therefore, the requirements of 326 IAC 8-4-4 are not included in the permit.

(xx) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)

This existing stationary source is located in Cass County, which is not one of the counties specifically listed in 326 IAC 8-4-1(a) or 326 IAC 8-4-1(b). Additionally:

- (1) The gasoline throughput of the gasoline dispensing facility (GDF) is less than 10,000 gallons per month (326 IAC 8-4-1(d)); and
- (2) The diesel dispensing facility (DDF) is not a gasoline dispensing facility, as defined in 326 IAC 8-4-6(a)(8).

Therefore, the requirements of 326 IAC 8-4-6 do not apply to the GDF or the DDF, and are not included in the permit for either unit.

(yy) 326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The requirements of 326 IAC 8-6-1 do not apply to the gasoline dispensing facility (GDF) or the diesel dispensing facility (DDF), since although the source-wide VOC potential emissions are greater than 100 tons (90.7 megagrams) per year, the GDF and DDF were each constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6-1 are not included in the permit.

(zz) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) do not apply to the gasoline dispensing facility (GDF) or the diesel dispensing facility (DDF), since this existing stationary source is located in Cass County, and not Clark, Floyd, Lake, or Porter Counties. Therefore, the requirements of 326 IAC 8-9 are not included in the permit.

- (aaa) There are no other 326 IAC 8 Rules that are applicable to the gasoline dispensing facility (GDF) or the diesel dispensing facility (DDF).

Compliance Determination and Monitoring Requirements

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

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

Compliance Determination Requirements

- (a) The compliance determination requirements applicable to this source are as follows:

(1) Woodworking Lines: MILL, IDI, and RETAIL

- (A) In order to assure that the emission units listed in the following table are exempt from the requirements of 326 IAC 6-3-2, the integral baghouses shall be in operation, and control emissions from the associated emission units, at all times the associated emission unit is in operation.

Unit ID	Process Description	Control Description
MILL	Woodworking Line	Baghouse BH-1
RETAIL	Woodworking Line	Baghouse BH-7

(B) In order to assure compliance with the requirements of 326 IAC 6-3-2, the integral baghouses (BH-1 through BH-6) serving woodworking line IDI, shall be in operation and control particulate emissions from all woodworking equipment comprising woodworking line IDI at all times that any of the woodworking equipment comprising the line is in operation.

(2) Wood Grinding: CH-HOG, IDI-HOG1, and IDI-HOG2

In order to assure compliance with the PSD Minor PM, PM10, and PM2.5 limitations in the permit, the particulate control devices shall be in operation and control emissions from the associated emission units (*as listed in the following table*) at all times when the associated emission unit is in operation:

Unit ID	Process Description	Control Description
CH-HOG	Cole Hardwood Wood Hog Grinder	Baghouse BH-8
IDI-HOG1	IDI Wood Hog Grinder #1	Baghouse BH-2
IDI-HOG2	IDI Wood Hog Grinder #2	Baghouse BH-4

(3) Waste Wood, and Ground Wood Conveying and Storage Operations

(A) There are no specific compliance determination requirements applicable to the waste wood conveying operations (CH-WWBCS and IDI-WWBCS).

(B) In order to assure compliance with the PSD Minor PM, PM10, and PM2.5 limitations in the permit, and to assure that the emission units listed in the following table are exempt from the requirements of 326 IAC 6-3-2, the integral cyclone collector/airlock units and associated particulate control devices shall be in operation and control emissions from the associated emission units (*as listed in the following table*) at all times when the associated emission unit is in operation.

Unit ID	Process Description	Control Description
CH-GWPCS	CH-GWPCS and Storage Silo CH-SILO1	Baghouse CH-BH
IDI-GWPCS1	IDI-GWPCS1 and Storage Silo IDI-SILO1	Baghouse IDI-BH1
IDI-GWPCS2	IDI-GWPCS2 and Storage Silo IDI-SILO2	Baghouse IDI-BH2

(4) Boilers - Wood-fired Boilers (BOILER1, BOILER2, AND BOILER3) and Diesel Fuel-fired Boiler (DB1)

In order to assure compliance with the PSD Minor PM, PM10, and PM2.5 limitations in the permit, and the requirements of 326 IAC 6-2-4, the particulate control devices shall be in operation and control emissions from the associated emission units (*as listed in the following table*) at all times when the associated emission unit is in operation.

Unit ID	Process Description	Control Description
BOILER1	10.0 MMBtu/hr Wood-Fired Boiler	Multiclone
BOILER2	18.4 MMBtu/hr Wood-Fired Boiler	Multiclone
BOILER3	20.1 MMBtu/hr Wood-Fired Boiler	Multiclone

- (5) Surface Coating Operations: SC-1, STENCIL, GREENSHED, AEROSOL, and ADHESIVE
- (A) In order to assure compliance with the requirements of 326 IAC 6-3-2(d), the dry particulate filters for particulate control shall be in operation and control emissions from the automated surface coating line (SC-1) at all times when the automated surface coating line (SC-1) is in operation
- (B) In order to assure compliance with the requirements of 326 IAC 6-3-2(d), the equivalent control methods (work practices) for particulate control shall be observed at all times when the two (2) low-pressure airless spray guns (GREENSHED) and low-pressure airless spray gun (STENCIL) are in operation.
- This is a revised requirement for this source.***
- (C) There are no specific compliance determination requirements applicable to the hand-held aerosol spray coating operation (AEROSOL) or the gluing operation (ADHESIVE).
- (6) The wood-drying kilns (KILN1 through KILN20) (process)
 There are no specific compliance determination requirements applicable to the twenty (20) wood-drying kilns (KILN1 through KILN20).
- (7) Cold Cleaner Degreaser (DEGREASER)
 There are no specific compliance determination requirements applicable to the cold cleaner degreaser (DEGREASER).
- (8) Ash Handling (AHD)
 There are no specific compliance determination requirements applicable to the ash handling and disposal operations (AHD).
- (9) Sawdust Handling (SHD)
 There are no specific compliance determination requirements applicable to the sawdust handling operations (SHD).
- (10) Fuel Dispensing and Storage Facilities (GDF and DDF)
 There are no specific compliance determination requirements applicable to the gasoline dispensing facility (GDF) or the diesel dispensing facility (DDF).

Testing Requirements

- (b) There are no specific testing requirements associated with any of the emission units at this source.

Compliance Monitoring Requirements

- (c) The compliance monitoring requirements applicable to this source are as follows:

- (1) Woodworking Lines: MILL, IDI, and RETAIL
 Woodworking lines MILL, IDI, and RETAIL have the following compliance monitoring requirements:

Unit ID	Emission Unit	Control Device	Stack / Vent	Operating Parameters	Frequency
MILL ^(A)	Woodworking Line	Baghouse BH-1	IDI01, IDI02, and IDI03	Visible Emissions Notations	Once per day
IDI ^(B)	Woodworking Line	Baghouses BH-2 through BH-6, each	DC2	Visible Emissions Notations	Once per day
RETAIL ^(A)	Woodworking Line	Baghouse BH-7	IDI03	Visible Emissions Notations	Once per day

- (A) These monitoring conditions are necessary for MILL and RETAIL because the above-listed control devices must operate properly to assure the operations are exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and to ensure compliance with the limits that render 326 IAC 2-2 (PSD) not applicable.
- (B) These monitoring conditions are necessary for IDI because the above-listed control devices must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), and the limits that render 326 IAC 2-2 (PSD) not applicable.
- (2) Wood Grinding: CH-HOG, IDI-HOG1, and IDI-HOG2
 The wood grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) have the following compliance monitoring requirements:

Unit ID	Emission Unit	Control Device	Stack / Vent	Operating Parameters	Frequency
CH-HOG	Cole Hardwood Wood Hog Grinder	Baghouse BH-2	n/a	Visible Emissions Notations	Once per day
IDI-HOG1	IDI Wood Hog Grinder #1	Baghouse BH-4	n/a	Visible Emissions Notations	Once per day
IDI-HOG2	IDI Wood Hog Grinder #2	Baghouse BH-8	n/a	Visible Emissions Notations	Once per day
n/a = not applicable					

These monitoring conditions are necessary because the above-listed control devices must operate properly to ensure compliance with the limits that render 326 IAC 2-2 (PSD) not applicable.

This is a new requirement for this source.

- (3) Waste Wood, and Ground Wood Conveying and Storage Operations
- (A) There are no specific compliance monitoring requirements applicable to the waste wood conveying operations (CH-WWBCS and IDI-WWBCS).
- (B) The ground wood conveying and storage operations have the following compliance monitoring requirements:

Unit ID	Emission Unit	Control Device	Stack / Vent	Operating Parameters	Frequency
CH-GWPCS ⁽ⁱ⁾	CH-GWPCS and Storage Silo CH-SILO1	Baghouse CH-BH	CH-BH-S1	Visible Emissions Notations	Once per day
IDI-GWPCS1 ⁽ⁱ⁾	IDI-GWPCS1 and Storage Silo IDI-SILO1	Baghouse IDI-BH1	IDI-BH-S1	Visible Emissions Notations	Once per day
IDI-GWPCS2 ⁽ⁱ⁾	IDI-GWPCS2 and Storage Silo IDI-SILO2	Baghouse IDI-BH2	IDI-BH-S2	Visible Emissions Notations	Once per day

- (i) These monitoring conditions are necessary because the above-listed control devices must operate properly to ensure compliance with limits that render 326 IAC 2-2 (PSD) not applicable.

These are new requirements for this source.

- (ii) There are no specific compliance monitoring requirements applicable to the ground wood auger conveying systems (CH-GWACS, and IDI-GWACS).

(4) Boilers - Wood-fired Boilers (BOILER1, BOILER2, AND BOILER3) and Diesel Fuel-fired Boiler (DB1)

- (A) There are no specific compliance monitoring requirements applicable to the wood-fired boiler BOILER1 or diesel fuel-fired boiler DB1.
- (B) Wood-fired boilers BOILER2, and BOILER3 have the following compliance monitoring requirements:

Unit ID	Emission Unit	Control Device	Stack/Vent	Operating Parameters	Frequency
BOILER2	18.4 MMBtu/hr Wood-fired Boiler	Multiclone	S2	Visible Emissions Notations	Once per day
BOILER3	20.1 MMBtu/hr Wood-fired Boiler	Multiclone	S3	Visible Emissions Notations	Once per day

These monitoring conditions are necessary because the above-listed control devices must operate properly to ensure compliance with 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units), and the limits that render 326 IAC 2-2 (PSD) not applicable.

These are existing requirements for this source.

(5) Surface Coating Operations: SC-1, STENCIL, GREENSHED, AEROSOL, and ADHESIVE

- (A) The automated surface coating line (SC-1) and two (2) low-pressure airless spray guns (GREENSHED), have the following compliance monitoring requirements:

Emission Unit	Operating Parameters	Frequency	Range
SC-1	Filter Inspections	Once per day	Normal/Abnormal
	Overspray	Once per week	Normal/Abnormal
	Stack Exhaust Observations	Once per month	Normal/Abnormal

These monitoring conditions are necessary because the above-listed control devices must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies).

- (B) There are no specific compliance monitoring requirements applicable to the two (2) low-pressure airless spray guns (GREENSHED), one (1) low-pressure airless spray gun (STENCIL), hand-held aerosol spray coating operation (AEROSOL), or the gluing operation (ADHESIVE).

(6) The wood-drying kilns (KILN1 through KILN20) (process)

There are no specific compliance monitoring requirements applicable to the twenty (20) wood-drying kilns (KILN1 through KILN20).

(7) Cold Cleaner Degreaser (DEGREASER)

There are no specific compliance monitoring requirements applicable to the cold cleaner degreaser (DEGREASER).

- (8) Ash Handling (AHD)
There are no specific compliance monitoring requirements applicable to the ash handling and disposal operations (AHD).
- (9) Sawdust Handling (SHD)
There are no specific compliance monitoring requirements applicable to the sawdust handling operations (SHD).
- (10) Fuel Dispensing and Storage Facilities (GDF and DDF)
There are no specific compliance monitoring requirements applicable to the gasoline dispensing facility (GDF) or the diesel dispensing facility (DDF).

Proposed Changes

The following changes listed below are due to the proposed modification:

1. **Section A.1 - Emission Units and Pollution Control Equipment Summary**
This section has been revised to include emission unit descriptions for the wood hog grinders and associated material conveying and handling operations. In addition, the section has been revised to clarify the Standard Industrial Classification (SIC) codes applicable to the operations at this source.
2. **Section A.2 - Specifically Regulated Insignificant Activities**
A number of specifically regulated insignificant activities have been added.
3. **Section A.3 - Insignificant Activities**
A new Section A.3 has been added to list production related insignificant activities, such as the wood-drying kilns, surface coating operations, material conveying and handling operations, and diesel dispensing and ash handling and disposal facilities.
4. **Section D.1 (now D.3) - Emissions Unit Operation Conditions - Boilers**
Existing Section D.1 has been renumbered as Section D.3. Additionally, the following changes have been made:
 - A. A new Condition D.3.2 - PSD Minor Limits has been added to allow for the source to maintain its PSD Minor Status.
6. **Section D.2 (now D.1) - Emissions Unit Operation Conditions - Woodworking**
Existing Section D.2 has been renumbered as Section D.1. Additionally, the following changes have been made:
 - A. Condition D.2.1 (now D.1.1) - Particulate, the 326 IAC 6-3-2 Allowable Emission Rates (E) have been revised to account for the use of the integral baghouses; and
 - B. Condition D.2.4 (now D.1.4) - Particulate Control, has been revised for clarity.
7. **New Section D.2 - Emissions Unit Operation Conditions - Wood Grinding, Conveying, and Storage**
A new Section D.2 has been created to address the requirements for the wood grinders (CH-HOG, IDI-HOG1, and IDI-HOG2), and associated conveying and storage operations.
8. **Section D.3 (now D.4) - Emissions Unit Operation Conditions - Surface Coating Operations**
Existing Section D.3 has been renumbered as Section D.4. Additionally, the 326 IAC 6-3-2 requirements were updated for GREENSHED and STENCIL, and the associated record keeping requirements deleted.

9. **New Section D.5 - Emissions Unit Operation Conditions - Degreasers**
A new Section D.5 has been created to address the requirements for the cold cleaner degreaser unit.
10. **Section E.1 - Emissions Unit Operation Conditions -**
Section E.1 has been revised to clarify the applicable rule citations.
11. **New Section E.2 - Emissions Unit Operation Conditions -**
A new Section E.2 has been created to address the National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: Area Source Standards for Industrial, Commercial, and Institutional Boilers Area Sources [40 CFR Part 63, Subpart JJJJJJ] for the boilers.
12. **New Section E.3 - Emissions Unit Operation Conditions -**
A new Section E.3 has been created to address the National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements for Source Category Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC] for the gasoline dispensing facility.

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

1. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions. The change is only to cite of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Specifically Regulated Insignificant Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, Section C - Risk Management Plan, the Facility Descriptions, and Section D - Preventative Maintenance Plan.
2. On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule cite of the "responsible official" definition. The rule citation has been changed throughout the permit as follows:

326 IAC 2-7-1(~~34~~)(35)
3. On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule cites of the "trivial activity", "section 502(b)(10) changes", and "regulated pollutant, which is used only for purposes of section 19 of this rule" definitions.
4. **Multiple Conditions - Timeframe References**
IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than" except for the timelines in subparagraphs (b)(4) and (b)(5) of Section B - Emergency Provisions and Section B - Annual Fee Payment, in which the underlying rules state "within".
5. **Multiple Conditions - Responsible Official References**
326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(35) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official".
6. **Multiple Conditions - Certification Requirement References**
IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet. IDEM, OAQ has decide to remove the last sentence dealing with the need for certification from the form(s) because the Condition(s) requiring the form(s) already address(es) this issue.

7. **Multiple Conditions - Branch Name Updates**

Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.
8. IDEM, OAQ has made changes to some of the standard language in the A conditions of the permit to help clarify the intent of these conditions. The following revisions have been made to the A Sections of the permit:
 - A. **Section A - General Information**

IDEM, OAQ has clarified the source description to better reflect operations at the source.
 - B. **Section A.1 - Emission Units and Pollution Control Equipment Summary**

The existing emission unit descriptions have been revised to include information required for state and federal rule applicability determination, such as construction dates, integral status of control equipment, and whether the units exhaust inside or outside the building. Additionally, unit IDs and a federal rule reference has been added where applicable.
9. IDEM, OAQ has made changes to some of the standard language in the B and C conditions of the permit to help clarify the intent of these conditions. The following revisions have been made to the B and C Sections of the permit:
 - A. **Section C - Asbestos Abatement Projects**

The Permittee has requested the short version of the Asbestos Abatement condition.
 - B. **Section C - Compliance Monitoring**

IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM. Additionally, IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
 - C. **Section C - Instrument Specifications**

IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
 - D. **Section C - Response to Excursions or Exceedances**

IDEM, OAQ has revised the language to clarify that a reasonable response may contain one or more steps. Additionally, IDEM, OAQ revised the CAM portion of the Section C - Response to Excursions or Exceedances to provide clarity. In paragraph (II)(c), the acronym QIP is being spelled out as Quality Improvement Plan because this is the first time it is mentioned in the condition. Additionally, in paragraphs (II)(f) and (II)(h)(1), the reference to paragraph (II)(a)(2) is being changed to paragraph (II)(c). Referencing paragraph (II)(a)(2) is correct, however IDEM, OAQ believes that referencing paragraph (II)(c) provides clarity.
 - E. **Section C - Emission Statement**

The rule cite for 'regulated pollutants' that is for reporting is specific to the Emission Statement moved with a rule update. It was 32 and now 33.
 - F. **Section C - General Record Keeping Requirements**

IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping. Additionally, IDEM has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule.

- G. **Section C - General Reporting Requirements**
IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
10. IDEM, OAQ has made changes to some of the standard language in conditions in the D and E Sections of the permit to help clarify the intent of these conditions. The following revisions have been made to the D and E Sections of the permit:
- A. **Sections D and E - Emission Unit Description Boxes**
The existing emission unit descriptions have been revised to include information required for state and federal rule applicability determination, such as construction dates, integral status of control equipment, and whether the units exhaust inside or outside the building. Additionally, unit IDs and a federal rule reference has been added where applicable.
- B. **Section D - Fuel Specifications**
Existing Condition D.1.2, renumbered D.3.1, has been revised for clarity and consistency. The definition of "clean wood" has been update to reflect the most recent model.
- C. **Section D - Compliance Determination Requirements**
IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Sections D.1 and D.2 to clarify the authority of these conditions.
- D. **Section D - Particulate Matter (PM)**
Existing Condition D.1.4, renumbered as D.3.5, has been revised to remove the cyclone failure requirement. A new Condition D.3.6 - Cyclone Failure Detection has been added to address these requirements.
- E. **Section D - Particulate Control, and Broken or Failed Bag Detection**
Existing Condition D.2.7, renumbered as D.1.6, has been revised to remove the multicompartment baghouse bag failure requirement. This requirement has been moved to Condition D.1.7 for clarity.
- F. **Section D - Visible Emissions Notations**
IDEM, OAQ has revised the language to clarify that a reasonable response may contain one or more steps.
- G. **Section D - Parametric Monitoring**
Condition D.2.6 - Parametric Monitoring has been deleted. IDEM has determined that only one (1) form of monitoring is necessary to confirm compliance with the permits limits and requirements. The associated recordkeeping has been removed as well.
- H. **Section E - New Source Performance Standards (NSPS) Requirements**
The existing Section E - New Source Performance Standards (NSPS) Requirements language has been replaced with a standardized version of the E Section. Additionally, IDEM added the rule citation 326 IAC 2-7-5(1) to the New Source Performance Standards (NSPS) Requirements subsection title in Section E.1 to clarify the authority of these conditions. Finally, IDEM, OAQ has clarified that a copy of the Federal Rule would be attached 'to the operating permit' rather than 'to this permit'.
11. The following changes have been made to the forms at the end of the permit:
- A. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

- B. The Quarterly Report form has been modified to remove the numbered months. The Permittee should state which months are being reported; and
- C. 326 IAC 2-7-16 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule.

Unaffected permit conditions have been re-numbered and the Table of Contents updated, as applicable. The Permit has been revised as follows, with deleted language shown as ~~strikeouts~~ and new language **bolded**.

A.1 General Information [326 IAC 2-7-4(c)]~~[326 IAC 2-7-5(1445)]~~[326 IAC 2-7-1(22)]

existing stationary **hardwood concentration yard and wholesale operation, and hardwood dimensions, panels, moldings, and cabinet components manufacturing and surface coating facility**~~sawing and surface coating of green, and kiln-dried lumber, and a lumber wholesale operation~~

* * * * *

SIC Code: **Cole Hardwood, Inc.:2429, 5034**
5031 (Lumber, Millwork, and Wood Panels)
2421 (Sawmills and planing mills, general);
Indiana Dimension, Inc.:
2434 (Wood Kitchen Cabinets); and
2431 (Millwork);

* * * * *

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]~~[326 IAC 2-7-5(1445)]~~

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

- (ae) One (1) woodworking line—, consisting of various wood surfacing and dimensioning equipment—, identified as the MILL, **constructed in 1998**, with a maximum input capacity of ~~4000~~**4,000** board feet (16,800 pounds) per hour, ~~utilizing~~**equipped with one (1)** baghouse (BH-1 ~~for control, and~~) **determined integral to the process**, exhausting through ~~stacks IDI01, IDI02, and IDI03~~**Stack DC1**.
- (bf) One (1) woodworking line—, consisting of various wood surfacing and dimensioning equipment—, identified as IDI, **constructed in 1990**, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, ~~having~~**equipped with six (6)** baghouses ~~for control~~(BH-1, BH-2, BH-3, BH-4, BH-5, and BH-6, ~~and~~) **determined integral to the process**, exhausting through ~~one (1) stack, identified as DC2~~**stacks IDI01, IDI02, and IDI03**.
- (cg) One (1) woodworking line—, consisting of various wood surfacing and dimensioning equipment—, identified as RETAIL, **constructed in 1999**, with a maximum input capacity of ~~4000~~**4,000** board feet (16,800 pounds) per hour, ~~having a~~**equipped with one (1)** baghouse ~~for control, and~~(BH-7) **determined integral to the process**, exhausting through ~~one (1) stack, identified as IDI03~~**into the HOG building**.
- (d) **One (1) Cole Hardwood Wood Hog grinder, identified as CH-HOG, constructed in 1983 and permitted in 2000, having a maximum throughput capacity of 8.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-8), exhausting outside the building.**
- (e) **One (1) IDI Wood Hog grinder, identified as IDI-HOG1, constructed in 1990 and permitted in 2000, having a maximum throughput capacity of 46.4 tons of wood**

scrap per hour, controlling particulate emissions using one (1) baghouse (BH-2), exhausting outside the building.

- (f) One (1) IDI Wood Hog grinder, identified as IDI-HOG2, constructed in 2005 and permitted in 2016, having a maximum throughput capacity of 92.8 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-4) and exhausting outside the building.**
- (g) Ground wood conveying and storage operations, consisting of:**
 - (1) One (1) pneumatic conveying system, identified as CH-GWPCS, constructed in 1983 and permitted in 2000, for transport of ground wood from grinding machine CH-HOG to storage silo CH-SILO1, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo CH-SILO1 baghouse (CH-BH) stack CH-BH-S1.**
 - (2) One (1) ground wood storage silo, identified as CH-SILO1, constructed in 1983, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, and a total storage capacity of 15,724 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (CH-BH), exhausting to stack CH-BH-S1.**
 - (3) One (1) ground wood auger conveying system, identified as CH-GWACS, constructed in 1983 and permitted in 2000, for transport of ground wood from ground wood storage silo CH-SILO1 to the BOILER1 and BOILER3 feed system, with a bottlenecked throughput capacity of 1.78 tons of ground wood per hour, uncontrolled and exhausting outside the building.**
 - (4) One (1) pneumatic conveying system, identified as IDI-GWPCS1, constructed in 1990 and permitted in 2000, for transport of ground wood from grinding machine IDI-HOG1 to storage silo IDI-SILO1, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO1 baghouse (IDI-BH1) stack IDI-BH-S1.**
 - (5) One (1) ground wood storage silo, identified as IDI-SILO1, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH1), exhausting to stack IDI-BH-S1.**
 - (6) One (1) pneumatic conveying system, identified as IDI-GWPCS2, constructed in 2005 and permitted in 2016, for transport of ground wood from grinding machine IDI-HOG2 to storage silo IDI-SILO2, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO2 baghouse (IDI-BH2) stack IDI-BH-S2.**
 - (7) One (1) ground wood storage silo, identified as IDI-SILO2, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH2), exhausting to stack IDI-BH-S2.**

- (8) **One (1) ground wood auger conveying system, identified as IDI-GWACS, constructed in 1990 and permitted in 2000, for transport of ground wood from ground wood storage silo IDI-SILO2 to the BOILER2 feed system, with a bottlenecked throughput capacity of 1.26 tons of ground wood per hour, uncontrolled and exhausting outside the building; and**
- (9) **Sawdust loading, identified as SLOAD, constructed in 1990 and permitted in 2016, consisting of gravity feed to trucks, with a maximum loading capacity of 40,000 pounds of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the silo.**
- (ha) One (1) wood-fired boiler, identified as **BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 10.0 MMBtu/hr, using ~~multi-cyclones as a~~ **multiclone for control, and** exhausting through one (1) stack, identified as S1.
- Under 40 CFR ~~6063~~, Subpart Dc, this ~~JJJJJJ~~ **(NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources)**, **BOILER1** is considered an affected facility.
- (ib) One (1) wood-fired boiler, identified as **BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 18.4 MMBtu/hr, using ~~multi-cyclones as a~~ **multiclone for control, and** exhausting through one (1) stack, identified as S2. Under 40 CFR ~~60~~, Subpart Dc, this
- Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2** is considered an affected facility.
- (je) One (1) wood-fired boiler, identified as **BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 20.1 MMBtu/hr, using ~~multi-cyclones as a~~ **multiclone for control, and** exhausting through one (1) stack, identified as S3. Under 40 CFR ~~60~~, Subpart Dc, this
- Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3** is considered an affected facility.
- (kd) One (1) diesel ~~fuel~~-fired boiler, used as a backup boiler, **identified as DB1, in service in 1990**, with a maximum heat input rate of 4.2 MMBtu/hr, **uncontrolled and exhausting outside the building.**
- Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), the diesel fuel-fired boiler is considered an affected facility.**
- (lj) One (1) automated surface coating line, identified as SC-1, **constructed in 2008**, with a maximum **throughput** capacity of 24,000 board feet per hour, equipped with high volume low pressure (HVLP) spray guns, using dry filters for particulate matter control, ~~and~~ exhausting ~~through~~ stacks SC-1, SC-2, SC-3, and SC-4.
- (mi) ~~One~~ **Two (2)** low-pressure airless spray ~~gun~~ **guns**, identified as **GREENSHED (formerly EU03-2₇)**, **constructed in 1998, used for coating wood board ends in Site Buildings 6 and 10**, with a maximum **throughput** capacity of 16,000 board feet (92,800 pounds) per hour, **uncontrolled, exhausting inside the building.**

- (nA) One (1) low-pressure airless spray gun, identified as **STENCIL (formerly EU03-1₇)**, **constructed in 1998, used for stenciling and** coating wood board ends, with a maximum **throughput** capacity of 4,000 board feet (16,800 pounds) per hour, **uncontrolled, exhausting inside the building.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(4514)]

This stationary source ~~does not currently have any~~ **also includes the following** insignificant activities ~~that~~ **which** are specifically regulated, **as defined in 326 IAC 2-7-1(21):**

- (a) One (1) cold cleaner degreaser, identified as DEGREASER, constructed in 2004, and permitted in 2016, utilizing a solvent having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) one-tenth (0.1) pound per square inch measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2] [326 IAC 8-3-8]
- (b) One (1) gasoline dispensing facility, identified as GDF, constructed in 1983 and permitted in 2016, having a maximum storage capacity of 500 gallons, filling storage tanks having a maximum capacity equal to or less than 10,500 gallons, and dispensing less than 300 gallons per month.

Under 40 CFR 63, Subpart CCCCC (NESHAPs for Source Category: Gasoline Dispensing Facilities), this unit is considered an affected facility.

- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

- (a) Twenty (20) wood-drying kilns, identified as KILN1 through KILN20, heated with steam from the wood-fired boilers (BOILER1, BOILER2, and BOILER3), having a "worst case" maximum throughput capacity of 144,000 board feet (144 mbf) per batch, each, uncontrolled, exhausting outside the building, and constructed according to the following schedule:
- (1) KILN1 through KILN4, constructed in 1989 and permitted in 2016.
 - (2) KILN5 through KILN8, constructed in 1978 and permitted in 2016.
 - (3) KILN9 through KILN12, constructed in 1999 and permitted in 2016.
 - (4) KILN13 through KILN16, constructed in 1991 and permitted in 2016; and
 - (5) KILN17 through KILN20, constructed in 1993 and permitted in 2016.
- (b) One (1) aerosol spray coating operation, identified as AEROSOL, permitted in 2016, using hand-held aerosol spray cans for bulk product (wood) marking purposes, using a maximum of 20 aerosol spray cans (up to 11 ounces each) per month, uncontrolled and conducted both inside and outside the building.
- (c) Two (2) enclosed belt conveying systems, identified as CH-WWBCS and IDI-WWBCS, constructed in 1983 and 1999, and permitted in 2016, for transport of waste wood from the MILL, IDI, and RETAIL woodworking lines to grinding machines CH-HOG, IDI-HOG1, and IDI-HOG2, respectively, with bottlenecked

throughput capacities of 8.4 and 92.8 tons of wood scrap per hour, respectively, uncontrolled and exhausting outside the building.

- (d) One (1) gluing operation, identified as ADHESIVE, permitted in 2016, applying water-based wood adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs. [326 IAC 2-7-1(21)(J)(ix)(EE)]
- (e) One (1) diesel dispensing facility, identified as DDF, constructed in 1979 and permitted in 2016, having a storage capacity of 5,000 gallons, and dispensing less than 1,800 gallons per month. [326 IAC 2-7-1(21)(J)(ii)(BB)]
- (f) Ash handling and disposal, identified as AHD, consisting of hand raking, wheelbarrows, front end loaders, and dump trucks, with a maximum throughput of 0.30 tons of ash per hour, uncontrolled, and exhausting partly inside and partly outside the building. [326 IAC 6-3]
- (g) Sawdust handling, identified as SHD, consisting of telescoping chutes, hand raking, wheelbarrows, front end loaders, and dump trucks, with a maximum throughput of 20 tons of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the building. [326 IAC 6-3]
- (h) Blowdown for any of the following: sight glass; boilers; compressors, pumps; and cooling.

SECTION B ————— GENERAL CONDITIONS

B.1 — Definitions [326 IAC 2-7-1]

~~Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.~~

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

- (a) ~~This permit, T017-29073-00028, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~
- (b) ~~If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

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

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

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

~~B.4 — Enforceability [326 IAC 2-7-7][IC 13-17-12]~~

~~Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.~~

~~B.5 — Severability [326 IAC 2-7-5(5)]~~

~~The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.~~

~~B.6 — Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]~~

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

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

~~(a) — The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~

~~(b) — For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

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

~~(a) — A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:~~

~~(i) — it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and~~

~~(ii) — the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

~~(b) — The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~

~~(c) — A "responsible official" is defined at 326 IAC 2-7-1(34).~~

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

~~(a) — The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than 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 46204-2254~~

~~and~~

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

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

~~The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]~~

- ~~(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:~~
- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
 - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
 - ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

~~The Permittee shall implement the PMPs.~~

- ~~(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:~~
- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
 - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~

~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

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

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~The Permittee shall implement the PMPs.~~

- ~~(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

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

- ~~(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.~~
- ~~(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:~~
- ~~(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;~~
 - ~~(2) The permitted facility was at the time being properly operated;~~
 - ~~(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;~~
 - ~~(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 46204-2254~~

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

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

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

~~The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(6) The Permittee immediately took all reasonable steps to correct the emergency.~~
- ~~(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~
- ~~(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- ~~(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.~~
- ~~(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.~~
- ~~(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

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

~~(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.~~

~~This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.~~

~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~

~~(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~

~~(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:~~

~~(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;~~

~~(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;~~

~~(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and~~

~~(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.~~

~~(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).~~

~~(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]~~

~~(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]~~

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

- ~~(a) — All terms and conditions of permits established prior to T017-29073-00028 and issued pursuant to permitting programs approved into the state implementation plan have been either:~~
- ~~(1) — incorporated as originally stated,~~
 - ~~(2) — revised under 326 IAC 2-7-10.5, or~~
 - ~~(3) — deleted under 326 IAC 2-7-10.5.~~
- ~~(b) — Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.~~

~~B.14 — Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]~~

~~The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).~~

~~B.15 — Permit Modification, Reopening, Revocation and Reissuance, or Termination~~

~~[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]~~

- ~~(a) — This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-4(34).~~
- ~~(b) — This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:~~
- ~~(1) — That this permit contains a material mistake.~~
 - ~~(2) — That inaccurate statements were made in establishing the emissions standards or other terms or conditions.~~
 - ~~(3) — That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]~~
- ~~(c) — Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]~~
- ~~(d) — The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]~~

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

- ~~(a) — The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained~~

~~in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

Request for renewal shall be submitted to:

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

~~(b) A timely renewal application is one that is:~~

~~(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

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

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

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

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

~~Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

~~B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]~~

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

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

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

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

- ~~(1) The changes are not modifications under any provision of Title I of the Clean Air Act;~~
- ~~(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;~~
- ~~(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);~~
- ~~(4) The Permittee notifies the:~~

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

~~and~~

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

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

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

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

- ~~(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

- ~~(1) A brief description of the change within the source;~~
- ~~(2) The date on which the change will occur;~~

- ~~(3) — Any change in emissions; and~~
- ~~(4) — Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

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

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

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

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

- ~~(a) — Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~
- ~~(b) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;~~
- ~~(c) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~
- ~~(d) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~
- ~~(e) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

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

- ~~(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~
- ~~(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251~~
- ~~Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

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

- ~~(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.~~
- ~~(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.~~
- ~~(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

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

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

* * * * *

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

- (a) This permit, T017-35999-00028, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.**

- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

and

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

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;**
- (2) The permitted facility was at the time being properly operated;**
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;**
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.**

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) **All terms and conditions of permits established prior to T017-35999-00028 and issued pursuant to permitting programs approved into the state implementation plan have been either:**
- (1) **incorporated as originally stated,**
 - (2) **revised under 326 IAC 2-7-10.5, or**
 - (3) **deleted under 326 IAC 2-7-10.5.**
- (b) **Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.**

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:**
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and**
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.**
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to**

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

* * * * *

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

~~C.1 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 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.3 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.4 — 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.5 — Fugitive Dust Emissions [326 IAC 6-4]~~

~~The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.~~

~~C.6 — Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]~~

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

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

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

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

~~(A) — Asbestos removal or demolition start date;~~

~~(B) — Removal or demolition contractor; or~~

~~(C) — Waste disposal site.~~

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

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

~~All required notifications shall be submitted to:~~

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

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(e) — Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~(f) — Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~
- ~~(g) — Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.~~

Testing Requirements [326 IAC 2-7-6(1)]

C.7 — Performance Testing [326 IAC 3-6]

- ~~(a) — For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:~~

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

~~no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(b) — The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(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.8 — Compliance Requirements [326 IAC 2-1.1-11]

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

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

~~C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]~~

~~Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

~~The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

~~C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]~~

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

~~(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.~~

~~Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]~~

~~C.11 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]~~

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

~~(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

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

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

~~C.13 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]~~

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

- ~~(a) When the results of a stack test performed in conformance with Section C – Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.~~
- ~~(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline~~
- ~~(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.~~

~~The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

~~C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]~~

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

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

~~The statement must be submitted to:~~

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

~~The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]~~

- ~~(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]~~

- ~~(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). 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 46204-2254~~

- ~~(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.18 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 C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements [326 IAC 2-7-6(1)]

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(11)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (3) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

-
- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, 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 Part 70 permit.

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.18 General Reporting Requirements [326 IAC 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 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.12 EMISSION UNIT FACILITY OPERATION CONDITIONS

Emission Unit Facility Description [326 IAC 2-7-5(1445)]: Woodworking

- (ae) One (1) woodworking line,— consisting of various wood surfacing and dimensioning equipment,— identified as the MILL, **constructed in 1998**, with a maximum input capacity of **40004,000** board feet (16,800 pounds) per hour, ~~utilizing~~ **equipped with one (1) baghouse (BH-1 for control, and) determined integral to the process**, exhausting through ~~stacks IDI01, IDI02, and IDI03~~ **Stack DC1**.
- (bf) One (1) woodworking line,— consisting of various wood surfacing and dimensioning equipment,— identified as IDI, **constructed in 1990**, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, ~~having~~ **equipped with six (6) baghouses for control (BH-1, BH-2, BH-3, BH-4, BH-5, and BH-6, and) determined integral to the process**, exhausting through ~~one (1) stack, identified as DC2~~ **stacks IDI01, IDI02, and IDI03**.
- (cg) One (1) woodworking line,— consisting of various wood surfacing and dimensioning equipment,— identified as RETAIL, **constructed in 1999**, with a maximum input capacity of **40004,000** board feet (16,800 pounds) per hour, ~~having a~~ **equipped with one (1) baghouse for control, and (BH-7) determined integral to the process**, exhausting through ~~one (1) stack, identified as IDI03~~ **into the HOG building**.

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

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

D.12.1 Particulate [326 IAC 6-3-2]

~~(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the two (2) woodworking lines identified as MILL and RETAIL shall not exceed 17.1 pounds per hour, each, when operating at a process weight rate of 8.4 tons per hour.~~

~~The pounds per hour limitation was calculated using the following:~~

~~Interpolation and extrapolation 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:~~

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

~~(b) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) woodworking line identified as IDI shall not exceed 43.889 pounds per hour when operating at a process weight rate of 46.4 tons per hour.~~

~~The pounds per hour emission limitation was calculated as using the following:~~

~~(b) Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour, or thirty (30) tons per hour, shall be accomplished by use of the equation:~~

~~$$E = 55.0 P^{0.11} - 40$$
 where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour~~

D.12.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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 2-7-5(1)]

D.12.4 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to **assure compliance** with Conditions D.12.1 and D.2.2, the **six (6) integral cyclones and baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, and BH-6) serving woodworking line IDI** for particulate control shall be in operation and control **particulate emissions from the woodworking equipment comprising the three (3) woodworking lines, identified as MILL, IDI, and RETAIL**, at all times that **any of the associated woodworking equipment** is these facilities are in operation.

(b) **In order to assure that woodworking lines MILL and RETAIL are exempt from the requirements of 326 IAC 6-3-2, the integral baghouses (BH-1 and BH-7) serving woodworking lines MILL and RETAIL shall be in operation and control particulate emissions from the woodworking equipment comprising woodworking lines MILL and RETAIL, at all times that any of the associated woodworking equipment is in operation.**

~~(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

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

D.12.5 Visible Emissions Notations

(a) Visible emission notations of **each of the seven (7) baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, and BH-7)** the three (3) woodworking lines, identified as MILL, IDI, and RETAIL, stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C -Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. **An abnormal visible emission notation is not a deviation from this permit.** Failure to take response steps shall be considered a deviation from this permit.

~~D.2.6 Parametric Monitoring [40 CFR 64.1]~~

~~The Permittee shall record the pressure drop across the baghouse used in conjunction with the three (3) woodworking lines, identified as MILL, IDI, and RETAIL, at least once weekly when these woodworking processes are in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.1 to 3 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

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

~~D.12.67 Broken or Failed Bag Detection~~

- ~~(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- ~~(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- ~~(c) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**~~

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

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

~~D.12.78 Record Keeping Requirements~~

- ~~(a) To document the compliance status with Condition D.12.45, the Permittee shall maintain records of daily visible emission notations of the **seven (7) baghouses (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, and BH-7)** ~~three (3) woodworking lines (MILL, IDI, and RETAIL)~~ stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).~~
- ~~(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain the following:~~
 - ~~(1) Weekly records of the pressure drop during normal operation when venting to the atmosphere.~~

~~(2) — Documentation of the dates the vents are redirected.~~

- (be) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

* * * * *

SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(14)]: Wood Grinding, Conveying, and Storage

- (d) One (1) Cole Hardwood Wood Hog grinder, identified as CH-HOG, constructed in 1983 and permitted in 2000, having a maximum throughput capacity of 8.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-8), exhausting outside the building.
- (e) One (1) IDI Wood Hog grinder, identified as IDI-HOG1, constructed in 1990 and permitted in 2000, having a maximum throughput capacity of 46.4 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-2), exhausting outside the building.
- (f) One (1) IDI Wood Hog grinder, identified as IDI-HOG2, constructed in 2005 and permitted in 2016, having a maximum throughput capacity of 92.8 tons of wood scrap per hour, controlling particulate emissions using one (1) baghouse (BH-4) and exhausting outside the building.
- (g) Ground wood conveying and storage operations, consisting of:
 - (1) One (1) pneumatic conveying system, identified as CH-GWPCS, constructed in 1983 and permitted in 2000, for transport of ground wood from grinding machine CH-HOG to storage silo CH-SILO1, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo CH-SILO1 baghouse (CH-BH) stack CH-BH-S1.
 - (2) One (1) ground wood storage silo, identified as CH-SILO1, constructed in 1983, with a bottlenecked throughput capacity of 8.4 tons of ground wood per hour, and a total storage capacity of 15,724 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (CH-BH), exhausting to stack CH-BH-S1.
 - (3) One (1) ground wood auger conveying system, identified as CH-GWACS, constructed in 1983 and permitted in 2000, for transport of ground wood from ground wood storage silo CH-SILO1 to the BOILER1 and BOILER3 feed system, with a bottlenecked throughput capacity of 1.78 tons of ground wood per hour, uncontrolled and exhausting outside the building.
 - (4) One (1) pneumatic conveying system, identified as IDI-GWPCS1, constructed in 1990 and permitted in 2000, for transport of ground wood from grinding machine IDI-HOG1 to storage silo IDI-SILO1, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO1 baghouse (IDI-BH1) stack IDI-BH-S1.
 - (5) One (1) ground wood storage silo, identified as IDI-SILO1, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH1), exhausting to stack IDI-BH-S1.

- (6) One (1) pneumatic conveying system, identified as IDI-GWPCS2, constructed in 2005 and permitted in 2016, for transport of ground wood from grinding machine IDI-HOG2 to storage silo IDI-SILO2, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, equipped with an integral cyclone collector/airlock unit, exhausting to storage silo IDI-SILO2 baghouse (IDI-BH2) stack IDI-BH-S2.
- (7) One (1) ground wood storage silo, identified as IDI-SILO2, constructed in 1990, with a bottlenecked throughput capacity of 46.4 tons of ground wood per hour, and a total storage capacity of 23,969 cubic feet of ground wood, equipped with one (1) baghouse for particulate control (IDI-BH2), exhausting to stack IDI-BH-S2.
- (8) One (1) ground wood auger conveying system, identified as IDI-GWACS, constructed in 1990 and permitted in 2000, for transport of ground wood from ground wood storage silo IDI-SILO2 to the BOILER2 feed system, with a bottlenecked throughput capacity of 1.26 tons of ground wood per hour, uncontrolled and exhausting outside the building; and
- (9) Sawdust loading, identified as SLOAD, constructed in 1990 and permitted in 2016, consisting of gravity feed to trucks, with a maximum loading capacity of 40,000 pounds of sawdust per hour, uncontrolled, exhausting partly inside and partly outside the silo.

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

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

D.2.1 PSD Minor Limits: PM, PM10, and PM2.5 [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions (after control) from each of the wood grinders and ground wood conveying and storage operations shall not exceed the corresponding pound per hour limitations listed in the table below:

Process	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
CH-HOG	2.94	1.68	1.68
IDI-HOG1	4.87	2.78	2.78
IDI-HOG2	9.74	5.57	5.57
CH-GWPCS and Storage Silo CH-S1	2.52	2.12	2.12
IDI-GWPCS1 and Storage silo IDI-S1	4.18	3.51	3.51
IDI-GWPCS2 and Storage silo IDI-S2	8.35	7.02	7.02

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

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

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the wood grinders and ground wood conveying and storage operations shall not exceed the corresponding pound per hour limitation listed in the table below:

Emission Unit	Process Weight Rate (tons/hr)	Process Weight Rate (lb/hr)	326 IAC 6-3 Allowable Emission Rate (lbs/hour)
CH-HOG	8.4	16,800	17.06
IDI-HOG1	46.4	92,800	43.88
IDI-HOG2	92.8	185,600	50.53
CH-GWPCS	8.4	16,800	17.06
IDI-GWPCS1	46.4	92,800	43.88
IDI-GWPCS2	92.8	185,600	50.53
CH-GWACS	1.78	3,550	6.02
IDI-GWACS	1.26	2,513	4.78

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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 2-7-5(1)]

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

In order to assure compliance with Conditions D.2.1 and D.2.2, the baghouses (BH-2, BH-4, and BH-8) for particulate control shall be in operation and control emissions from each of the wood hog grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) at all times when the respective wood hog grinder is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the three (3) wood hog grinders (CH-HOG, IDI-HOG1, and IDI-HOG2) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the ground wood conveying and storage operations (CH-GWPCS, IDI-GWPCS1, and IDI-GWPCS2) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (f) **If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C -Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.**

D.2.6 Broken or Failed Bag Detection

- (a) **For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) **For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (c) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

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

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

D.2.7 Record Keeping Requirements

- (a) **To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the three (3) wood hog grinders (CH-HOG, IDI-HOG1, and IDI-HOG2), and ground wood conveying and storage operations (CH-GWPCS, IDI-GWPCS1, and IDI-GWPCS2) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).**
- (b) **Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

SECTION D.34 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(1445)]: Boilers

(ha) One (1) wood-fired boiler, identified as **BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 10.0 MMBtu/hr, using ~~multi-cyclones~~ **as a multicclone for control**, and exhausting through one (1) stack, identified as S1.

~~Under 40 CFR 6063, Subpart Dc, this~~ **JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER1 is considered an affected facility.**

(ib) One (1) wood-fired boiler, identified as **BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 18.4 MMBtu/hr, using ~~multi-cyclones~~ **as a multicclone for control**, and exhausting through one (1) stack, identified as S2. ~~Under 40 CFR 60, Subpart Dc, this~~

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.

(je) One (1) wood-fired boiler, identified as **BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 20.1 MMBtu/hr, using ~~multi-cyclones~~ **as a multicclone for control**, and exhausting through one (1) stack, identified as S3. ~~Under 40 CFR 60, Subpart Dc, this~~

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.

(kd) One (1) diesel **fuel**-fired boiler, used as a backup boiler, **identified as DB1, in service in 1990**, with a maximum heat input rate of 4.2 MMBtu/hr, **uncontrolled and exhausting outside the building**.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), the diesel fuel-fired boiler is considered an affected facility.

(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 2-7-5(1)]

D.34.12 Fuel Specifications ~~Wood-Fired Boiler Operation~~ [326 IAC 4-2][40 CFR 60, Subpart AAAA][40 CFR 60, Subpart EEEE]

In order to render the provisions of 40 CFR 60, Subpart AAAA and 40 CFR 60, Subpart EEEE not applicable, the Permittee shall combust only clean wood in **each of the three (3) wood-fired boilers (BOILER1EU01-1, BOILER2EU01-2, and BOILER3EU01-3.**

For the purposes of this permit, clean wood only consists of uncoated, unpainted, and untreated wood (including lumber), wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials, including ~~is defined as untreated wood or untreated wood products including clean untreated lumber, whole or chipped tree stumps, and whole or chipped tree limbs.~~ **Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate,**

pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

Compliance with this requirement shall render the requirements of 326 IAC 4-2 (Incinerators), and 326 IAC 12 (40 CFR 60, Subpart AAAA - New Source Performance Standards for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 and 40 CFR 60, Subpart EEEE - New Source Performance Standards for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006) not applicable.

D.3.2 PSD Minor Limits: PM, PM10, and PM2.5 [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions (after control) from the wood-fired boilers (BOILER1, BOILER2, and BOILER3) shall not exceed the corresponding pound per hour limitations listed in the table below:

Process	Emission Limitations (lbs/hr)		
	PM	PM10	PM2.5
BOILER1	5.60	5.17	4.47
BOILER2	3.09	2.85	2.47
BOILER3	3.38	3.12	2.70

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

D.3.4.34 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4, emissions from the wood-fired boiler, identified as **BOILER1**, shall be limited to 0.60 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4, emissions from the wood-fired boiler, identified as **BOILER2**, shall be limited to 0.44 pounds per MMBtu heat input.
- (c) Pursuant to 326 IAC 6-2-4, emissions from the wood-fired boiler, identified as **BOILER3**, shall be limited to 0.39 pounds per MMBtu heat input.
- (d) Pursuant to 326 IAC 6-2-4, emissions from the diesel **fuel**-fired boiler, **identified as DB1**, shall be limited to 0.4455 pounds per MMBtu heat input.

The allowable emission limits are based on the following equation:

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

Where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.34.43 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.34.54 Particulate Matter (PM) [326 IAC 2-7-6(6)]

(a) ~~—~~ **In order to assure compliance with Condition D.3.2, the multiclones multi-cyclones for particulate PM control shall be in operation and control emissions from the wood-fired boilers, identified as EU01-1, BOILER2EU01-2, and BOILER3EU01-3 at all times that the associated boilers is** are in operation.

(b) ~~—~~ In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps shall be considered a deviation from this permit.

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

D.34.65 Visible Emissions Notations

- (a) Visible emission notations of **each of the three (3) wood-fired boilers' (BOILER1, BOILER2, and BOILER3)** stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. **An abnormal visible emission notation is not a deviation from this permit.** Failure to take response steps shall be considered a deviation from this permit.

D.3.7 Cyclone Failure Detection

In the event that cyclone failure has been observed, the following shall apply:

- (a) **For a cyclone controlling emissions from a process operated continuously, the failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps shall be considered a deviation from this permit.**

- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps shall be considered a deviation from this permit.

~~D.1.6 Multi-Cyclone Inspections~~

~~An inspection shall be performed each calendar quarter of all cyclones controlling the wood-fired boilers when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months.~~

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

~~D.34.87~~ Record Keeping Requirements

- (a) To document the compliance status with Condition ~~D.34.65~~, the Permittee shall maintain records of daily visible emission notations of ~~the three (3) wood-fired boilers'~~ **BOILER2 and BOILER3** stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

* * * * *

SECTION D.43 ~~EMISSION UNIT~~FACILITY OPERATION CONDITIONS

Emission UnitFacility Description [326 IAC 2-7-5(1445)]: Surface Coating Operations

- (l) One (1) automated surface coating line, identified as SC-1, **constructed in 2008**, with a maximum **throughput** capacity of 24,000 board feet per hour, equipped with high volume low pressure (HVLP) spray guns, using dry filters for particulate matter control, and exhausting ~~through~~ **through** stacks SC-1, SC-2, SC-3, and SC-4.
- (m) ~~One Two (2)~~ low-pressure airless spray gun **guns**, identified as **GREENSHED (formerly EU03-2)**, **constructed in 1998, used for coating wood board ends in Site Buildings 6 and 10**, with a maximum **throughput** capacity of 16,000 board feet (92,800 pounds) per hour, **uncontrolled, exhausting inside the building**.
- (n) ~~One (1)~~ low-pressure airless spray gun, identified as **STENCIL (formerly EU03-1)**, **constructed in 1998, used for stenciling and coating wood board ends**, with a maximum **throughput** capacity of 4,000 board feet (16,800 pounds) per hour, **uncontrolled, exhausting inside the building**.

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

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

~~D.43.1~~ Particulate (PM) [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate **emissions** from ~~the one (1)~~ automated surface coating line,

~~identified as SC-1, and the one (1) low-pressure airless spray gun, identified as EU03-2,~~ shall be controlled by dry particulate filters, **and the Permittee shall operate the control device which shall be operated by the Permittee** in accordance with manufacturer's specifications.

- (b) Pursuant to 326 IAC 6-3-2(d) particulate emissions from the two (2) low-pressure airless spray guns (GREENSHED) shall be controlled using the following equivalent control methods (work practices):

The Permittee shall:

- (A) Spray coat only wood and wood derived materials.
- (B) Operate the coating operation inside the building.
- (C) Use applicators with tips and pressures that do not atomize spray.
- (D) Spray no further than 36" from the coating surface.
- (E) Maintain and operate the spray application equipment in accordance with the manufacturer's recommendations.
- (F) Install overspray controls if accumulations of overspray are observed anywhere on the building or grounds outside the building.

- (c) Pursuant to ~~326 IAC 6-3-2(d)(4) (Particulate Emission Limitations for Manufacturing Processes), the one (1) low-pressure airless spray gun, identified as EU03-1, shall use less than five (5) gallons of coating per day.~~ Pursuant to 326 IAC 6-3-2(d) particulate emissions from the low-pressure airless spray gun (STENCIL) shall be controlled using the following equivalent control methods (work practices):

The Permittee shall:

- (A) Spray coat only wood and wood derived materials.
- (B) Operate the coating operation inside the building.
- (C) Use applicators with tips and pressures that do not atomize spray.
- (D) Spray no further than 36" from the coating surface.
- (E) Maintain and operate the spray application equipment in accordance with the manufacturer's recommendations.
- (F) Install overspray controls if accumulations of overspray are observed anywhere on the building or grounds outside the building.

D.4.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), **for the automated surface coating line SC-1, the Permittee shall perform** the surface coating ~~of applied to wood furniture, and wood cabinets, and components of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations,~~ **in** booths EU03-1, EU03-2, and SC-1 shall utilize **using one (1) or more** of the following application methods:

- Airless spray application
- Air assisted airless spray application
- Electrostatic spray application
- Electrostatic bell or disc application
- Heated airless spray application
- Roller coating
- Brush or wipe application; or
- Dip-and-drain application

~~Airless spray application~~

~~Air assisted airless spray application~~

~~Electrostatic spray application~~

~~Electrostatic bell or disc application~~
~~Heated airless spray application~~
~~Roller coating~~
~~Brush or wipe application~~
~~Dip and drain application~~

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

D.43.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.4.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) **In order to assure compliance with Condition D.4.1(a), the dry particulate filters for particulate control shall be in operation and control emissions from automated surface coating line SC-1 at all times when automated surface coating line SC-1 is in operation.**
- (b) **In order to assure compliance with Conditions D.4.1(b), and D.4.1(c), the equivalent control methods (work practices) for particulate control shall be observed at all times when the two (2) low-pressure airless spray guns (GREENSHED) and low-pressure airless spray gun (STENCIL) are in operation.**

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

D.43.54 Dry Filter Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry particulate filters. To monitor the performance of the filters, weekly observations shall be made of the overspray from ~~the one (1)~~ automated surface coating line SC-1 stacks (SC-1, SC-2, SC-3, and SC-4) **exhausts** while ~~one or more of the booths is~~ are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.43.65 Record Keeping Requirements

- (a) To document the compliance status with Condition D.43.54, the Permittee shall maintain a log of daily dry particulate filter inspections, weekly overspray observations, and monthly inspections. The Permittee shall include in its daily record when a dry particulate

filter inspection is not performed and the reason for the lack of dry particulate filter inspection notation (e.g., the process did not operate that day).

~~(b) To document the compliance status with Condition D.3.1(b), the Permittee shall maintain a log of daily coating use.~~

(be) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

* * * * *

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Degreasers

Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

- (a) One (1) cold cleaner degreaser, identified as DEGREASER, constructed in 2004 and permitted in 2016, utilizing a solvent having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2][326 IAC 8-3-8]

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements), for cold cleaning operations constructed after January 1, 1980, the Permittee shall comply with the following:

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover;
 - (2) Equip the degreaser with a device for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operation requirements in subdivisions (3), (4), (6), and (7);
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:**
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):**
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.**
 - (C) A refrigerated chiller.**
 - (D) Carbon adsorption.**
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.**
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.**
 - (3) If used, solvent spray:**
 - (A) must be a solid, fluid stream; and**
 - (B) shall be applied at a pressure that does not cause excessive splashing.**

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

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

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

D.5.4 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:**
- (1) The name and address of the solvent supplier.**
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).**

- (3) The type of solvent purchased.
- (4) The total volume of the solvent purchased
- (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

* * * * *

SECTION E.1

NSPS REQUIREMENTS

Emissions Unit Description [326 IAC 2-7-5(14)]: Boilers

(ib) One (1) wood-fired boiler, identified as **BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 18.4 MMBtu/hr, using ~~multi-cyclones as a multicclone for control, and~~ exhausting through one (1) stack, identified as S2. ~~Under 40 CFR 60, Subpart Dc, this~~

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.

(je) One (1) wood-fired boiler, identified as **BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood**, with a maximum heat input rate of 20.1 MMBtu/hr, using ~~multi-cyclones as a multicclone for control, and~~ exhausting through one (1) stack, identified as S3. ~~Under 40 CFR 60, Subpart Dc, this~~

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.

* * * * *

E.1.1 General Provisions Relating to **New Source Performance Standards (NSPS)** [326 IAC 12-1-4][40 CFR 60, Subpart A]

(a) Pursuant to **40 CFR 60.1**, the Permittee shall comply with ~~the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1-4, for the emission unit(s) listed above, apply to the facility described in this section except as~~ otherwise specified in 40 CFR Part 60, Subpart Dc.

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

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

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

The Permittee shall comply with the **following** provisions of 40 CFR 60, Subpart Dc (**included as Attachment A to the operating permit**) ~~Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which are incorporated by reference as 326~~

~~IAC 12, for the emission unit(s) listed above 1-1. This rule is included as Attachment A. This source is subject to the following requirements of 40 CFR Part 60, Subpart Dc:~~

- (1) 40 CFR 60.40c(a), (b), (c), and (d).
- (2) 40 CFR 60.41c; and
- (3) 40 CFR 60.48c(a)(1), (a)(3), (g), and (i).

* * * * *

SECTION E.2

NESHAPS REQUIREMENTS

Emissions Unit Description [326 IAC 2-7-5(14)]: Boilers

- (h) One (1) wood-fired boiler, identified as BOILER1 (formerly EU01-1), in service in 1985, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 10.0 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S1.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER1 is considered an affected facility.

- (i) One (1) wood-fired boiler, identified as BOILER2 (formerly EU01-2), in service in 1990, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 18.4 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S2.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER2 is considered an affected facility.

- (j) One (1) wood-fired boiler, identified as BOILER3 (formerly EU01-3), in service in 1997, combusting only clean, dry, untreated ground wood, with a maximum heat input rate of 20.1 MMBtu/hr, using a multiclone for control, exhausting through one (1) stack, identified as S3.

Under 40 CFR 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), BOILER3 is considered an affected facility.

- (k) One (1) diesel fuel-fired boiler, used as a backup boiler, identified as DB1, in service in 1990, with a maximum heat input rate of 4.2 MMBtu/hr, uncontrolled and exhausting outside the building.

Under 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources), the diesel fuel-fired boiler is considered an affected facility.

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

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

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

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as

326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJJJJJ.

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

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

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJJJ (included as Attachment B to the operating permit), for the emission unit(s) listed above:

- (A) 40 CFR 63.11193.
- (B) 40 CFR 63.11194(a), (a)(1), (b), and (f).
- (C) 40 CFR 63.11196(a), (a)(1), and (a)(3).
- (D) 40 CFR 63.11200(b).
- (E) 40 CFR 63.11201(a), (b), and (d).
- (F) 40 CFR 63.11205(a).
- (G) 40 CFR 63.11210(c).
- (H) 40 CFR 63.11214(b).
- (I) 40 CFR 63.11223(a).
- (J) 40 CFR 63.11225(a), (a)(1), (a)(2), (a)(4), (a)(4)(i), (a)(4)(ii), (a)(4)(iii), (a)(4)(vi), and (a)(5).
- (K) 40 CFR 63.11225(b), (b)(1), (b)(2), (b)(2)(i), (b)(2)(iii), and (b)(3).
- (L) 40 CFR 63.11225(c), (c)(1), (c)(2), (c)(2)(i), (c)(2)(iii), (c)(4), (c)(5), (c)(6), and (d).
- (M) 40 CFR 63.11235.
- (N) 40 CFR 63.11236.
- (O) 40 CFR 63.11237.
- (P) Table 2 (items 6 and 16); and
- (Q) Table 8.

SECTION E.3

NESHAP Requirements

Emissions Unit Descriptions [326 IAC 2-7-5(14)]: Gasoline Dispensing Facilities (GDF)

- (b) One (1) gasoline dispensing facility, identified as GDF, constructed in 1983 and permitted in 2016, having a maximum storage capacity of 500 gallons, filling storage tanks having a maximum capacity equal to or less than 10,500 gallons, and dispensing less than 300 gallons per month.

Under 40 CFR 63, Subpart CCCCCC (NESHAPs for Source Category: Gasoline Dispensing Facilities), this unit is considered an affected facility.

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

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

**E.3.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants
under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

**E.3.2 National Emissions Standards for Hazardous Air Pollutants for Source Category Gasoline
Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]**

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (*included as Attachment C to the operating permit*), for the emission unit(s) listed above:

- | | |
|---|---------------------------|
| (1) 40 CFR 63.11110. | (7) 40 CFR 63.11125(d). |
| (2) 40 CFR 63.11111(a), (b), (e), (f), (h), (i), and (j). | (8) 40 CFR 63.11126(b). |
| (3) 40 CFR 63.11112(a), and (b). | (9) 40 CFR 63.11130. |
| (4) 40 CFR 63.11113(a), and (a)(1). | (10) 40 CFR 63.11131. |
| (5) 40 CFR 63.11115. | (11) 40 CFR 63.11132; and |
| (6) 40 CFR 63.11116. | (12) Table 3. |

EMERGENCY OCCURRENCE REPORT

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

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

* * * * *

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

* * * * *

No other changes have been made to the permit.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 29, 2015. Additional information was received on July 6, 2015 through June 8, 2016.

The construction of the proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No.: 017-37058-00028. The continued operation of this existing stationary hardwood concentration yard and wholesale operation, and wood furniture manufacturing and surface coating facility shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No.: T017-35999-00028. The staff recommends to the Commissioner that the Part 70 Significant Source Modification and the Part 70 Operating Permit Renewal be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.
- (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.1: Emissions Calculations
Entire Source Summary**

Company Name: Cole Hardwood, Inc.
Source Address: 1611 West Market Street Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Emission Unit	Uncontrolled/Unlimited Potential to Emit Before Integral Woodworking Controls (tons/yr)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAP	"Worst" Single HAP	
Ducted/ductable Emissions										
MILL Woodworking Line ^(a)	12.88	7.36	7.36	--	--	--	--	--	--	--
IDI Woodworking Line ^(a)	71.13	40.65	40.65	--	--	--	--	--	--	--
RETAIL Woodworking Line ^(a)	12.88	7.36	7.36	--	--	--	--	--	--	--
Wood Grinding (Inc. CH-HOG, IDI-HOG1, & IDI-HOG2)	226.27	129.30	129.30	--	--	--	--	--	--	--
Ground Wood Conveying and Storage ^(a)	659.76	237.52	237.52	--	--	--	--	--	--	--
Wood-fired Boilers (Boiler1, Boiler2, and Boiler3)	118.96	109.83	94.96	5.31	46.73	2.76	127.46	7.49	4.06	(HCL)
SC-1 Coating Line	24.83	24.83	24.83	--	--	54.58	--	0.00	--	--
KILNS 1-20	--	--	--	--	--	46.08	4.97	6.46	2.86	(methanol)
Waste Wood Conveying and Handling	1.33	0.49	0.49	--	--	--	--	--	--	--
STENCIL Coating Operation	1.04	1.04	1.04	--	--	1.61	--	1.61	1.61	(methanol)
GREENSHED Coating Operation	2.15	2.15	2.15	--	--	0.00	--	0.00	--	--
Aerosol Spray Coating	0.07	0.07	0.07	--	--	0.20	--	0.07	0.07	(toluene)
Adhesives	--	--	--	--	--	0.50	--	0.00	--	--
Cold Cleaner Degreaser	--	--	--	--	--	0.49	--	4.86E-04	4.86E-04	(toluene)
Diesel-Fired Boiler (DB1)	0.26	0.31	0.28	9.33	2.63	0.04	0.66	9.01E-04	2.76E-04	(selenium)
Total Ducted/ductable Emissions	1,131.56	560.89	545.99	14.64	49.36	106.27	133.08	15.63	4.47	(methanol)
Title V Major Source Thresholds	N/A	100	100	100	100	100	100	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	N/A	N/A	
Fugitive Emissions										
Ground Wood Conveying and Handling	2.60	1.23	0.19	--	--	--	--	--	--	--
Ash Handling	5.16E-01	2.44E-01	3.70E-02	--	--	--	--	--	--	--
Sawdust Handling	0.02	0.10	6.95E-03	--	--	--	--	--	--	--
Storage Piles	0.37	0.13	0.13	--	--	--	--	--	--	--
Paved Roadways	6.60	1.32	0.32	--	--	--	--	--	--	--
Unpaved Roadways	21.20	6.03	0.60	--	--	--	--	--	--	--
Gasoline Dispensing Facility	--	--	--	--	--	0.04	--	5.39E-04	1.77E-04	(toluene)
Total Fugitive Emissions	31.30	9.05	1.29	0	0	0.04	0	5.39E-04	1.77E-04	(toluene)
Totals Unlimited/Uncontrolled PTE	1,162.86	569.94	547.27	14.64	49.36	106.31	133.08	15.63	4.47	(methanol)

(a) 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 applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

**Appendix A.1: Emissions Calculations
Entire Source Summary**

Company Name: Cole Hardwood, Inc.
Source Address: 1611 West Market Street Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Emission Unit	Unlimited Potential to Emit After Integral Controls (tons/year)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAP	"Worst" Single HAP	
Ducted/ductable Emissions										
MILL Woodworking Line ^(a)	0.64	0.37	0.37	--	--	--	--	--	--	--
IDI Woodworking Line ^(a)	3.56	2.03	2.03	--	--	--	--	--	--	--
RETAIL Woodworking Line ^(a)	0.64	0.37	0.37	--	--	--	--	--	--	--
Wood Grinding (Inc. CH-HOG, IDI-HOG1, & IDI-HOG2)	226.27	129.30	129.30	--	--	--	--	--	--	--
Ground Wood Conveying and Storage ^(b)	207.22	167.69	167.69	--	--	--	--	--	--	--
Wood-fired Boilers (Boiler1, Boiler2, and Boiler3)	118.96	109.83	94.96	5.31	46.73	2.76	127.46	7.49	4.06	(HCL)
SC-1 Coating Line	24.83	24.83	24.83	--	--	54.58	--	0.00	--	--
KILNS 1-20	--	--	--	--	--	46.08	4.97	6.46	2.86	(methanol)
Waste Wood Conveying and Handling	1.33	0.49	0.49	--	--	--	--	--	--	--
STENCIL Coating Operation	1.04	1.04	1.04	--	--	1.61	--	1.61	1.61	(methanol)
GREENSHED Coating Operation	2.15	2.15	2.15	--	--	0.00	--	0.00	--	--
Aerosol Spray Coating	0.07	0.07	0.07	--	--	0.20	--	0.07	0.07	(toluene)
Adhesives	--	--	--	--	--	0.50	--	0.00	--	--
Cold Cleaner Degreaser	--	--	--	--	--	0.49	--	4.86E-04	4.86E-04	(toluene)
Diesel-Fired Boiler (DB1)	0.26	0.31	0.28	9.33	2.63	0.04	0.66	9.01E-04	2.76E-04	(selenium)
Total Ducted/ductable Emissions	586.98	438.47	423.57	14.64	49.36	106.27	133.08	15.63	4.47	(methanol)
PSD Major Source Thresholds	250	250	250	250	250	250	250	N/A	N/A	
Fugitive Emissions										
Ground Wood Conveying and Handling	2.60	1.23	0.19	--	--	--	--	--	--	--
Ash Handling	0.52	0.24	0.04	--	--	--	--	--	--	--
Sawdust Handling	0.02	0.10	6.95E-03	--	--	--	--	--	--	--
Storage Piles	0.37	0.13	0.13	--	--	--	--	--	--	--
Paved Roadways	6.60	1.32	0.32	--	--	--	--	--	--	--
Unpaved Roadways	21.20	6.03	0.60	--	--	--	--	--	--	--
Gasoline Dispensing Facility	--	--	--	--	--	0.04	--	5.39E-04	1.77E-04	(toluene)
Total Fugitive Emissions	31.30	9.05	1.29	0	0	0.04	0	5.39E-04	1.77E-04	(toluene)
Totals Unlimited/Uncontrolled PTE	618.28	447.52	424.86	14.64	49.36	106.31	133.08	15.63	4.47	(methanol)

(a) Woodworking potential emissions considered after integral controls for the purpose of determining the permitting level for this source. See the above table, and the "Integral Part of the Process" Determination section of the TSD for more detail.

(b) The pneumatic ground wood conveying systems potential emissions considered after integral controls for the purpose of determining the permitting level for this source. See the "Integral Part of the Process" Determination section of the TSD for more detail.

**Appendix A.1: Emissions Calculations
Entire Source Summary**

Company Name: Cole Hardwood, Inc.
Source Address: 1611 West Market Street Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Emission Unit	Limited Potential to Emit After Integral Controls (tons/year)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAP	"Worst" Single HAP	
Ducted/ductable Emissions										
MILL Woodworking Line ^(a)	0.64	0.37	0.37	--	--	--	--	--	--	--
IDI Woodworking Line ^(a)	3.56	2.03	2.03	--	--	--	--	--	--	--
RETAIL Woodworking Line ^(a)	0.64	0.37	0.37	--	--	--	--	--	--	--
Wood Grinding ^(a) (Inc. CH-HOG, IDI-HOG1, & IDI-HOG2)	76.90	43.94	43.94	--	--	--	--	--	--	--
Ground Wood Conveying and Storage ^(a)	79.19	60.14	60.14	--	--	--	--	--	--	--
Wood-fired Boilers (Boiler1, Boiler2, and Boiler3)	52.86	48.80	42.19	5.31	46.73	2.76	127.46	7.49	4.06	(HCL)
SC-1 Coating Line	24.83	24.83	24.83	--	--	54.58	--	0.00	--	--
KILNS 1-20	--	--	--	--	--	46.08	4.97	6.46	2.86	(methanol)
Waste Wood Conveying and Handling	1.33	0.49	0.49	--	--	--	--	--	--	--
STENCIL Coating Operation	1.04	1.04	1.04	--	--	1.61	--	1.61	1.61	(methanol)
GREENSHED Coating Operation	2.15	2.15	2.15	--	--	0.00	--	0.00	--	--
Aerosol Spray Coating	0.07	0.07	0.07	--	--	0.20	--	0.07	0.07	(toluene)
Adhesives	--	--	--	--	--	0.50	--	0.00	--	--
Cold Cleaner Degreaser	--	--	--	--	--	0.49	--	4.86E-04	4.86E-04	(toluene)
Diesel-Fired Boiler (DB1)	0.26	0.31	0.28	9.33	2.63	0.04	0.66	9.01E-04	2.76E-04	(selenium)
Total Ducted/ductable Emissions	243.46	184.54	177.90	14.64	49.36	106.27	133.08	15.63	4.47	(methanol)
PSD Major Source Thresholds	250	250	250	250	250	250	250	N/A	N/A	
Fugitive Emissions										
Ground Wood Conveying and Handling	2.60	1.23	0.19	--	--	--	--	--	--	--
Ash Handling	0.52	0.24	0.04	--	--	--	--	--	--	--
Sawdust Handling	0.02	0.10	6.95E-03	--	--	--	--	--	--	--
Storage Piles	0.37	0.13	0.13	--	--	--	--	--	--	--
Paved Roadways	6.60	1.32	0.32	--	--	--	--	--	--	--
Unpaved Roadways	21.20	6.03	0.60	--	--	--	--	--	--	--
Gasoline Dispensing Facility	--	--	--	--	--	0.04	--	5.39E-04	1.77E-04	(toluene)
Total Fugitive Emissions	31.30	9.05	1.29	0	0	0.04	0	5.39E-04	1.77E-04	(toluene)
Totals Limited/Controlled PTE	274.77	193.58	179.18	14.64	49.36	106.31	133.08	15.63	4.47	(methanol)

(a) Woodworking potential emissions considered after integral controls for the purpose of determining the permitting level for this source. See the above table, and the "Integral Part of the Process" Determination section of the TSD for more detail.

(b) Limited PM/PM10/PM2.5 PTE based on pound per hour emission limits to render the requirements of 326 IAC 2-2 (PSD) not applicable.

All remaining emissions listed in the above-table are unrestricted PTE.

**Appendix A.1: Emissions Calculations
Particulate (PM/PM10/PM2.5) Emissions
from Woodworking Operations**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Emission Unit ID	Baghouse ID	Maximum Capacity (tons/hour)	Emission Factors (lbs/ton)**		Uncontrolled PTE				PTE After Integral Control			
			PM	PM10/PM2.5*	PM (lbs/hr)	PM10/PM2.5 (lbs/hr)	PM (tons/yr)	PM10/PM2.5 (tons/yr)	Control Efficiency (%)	PTE of PM (lbs/hr)	PTE of PM (tons/yr)	PTE of PM10/PM2.5 (tons/yr)
MILL	BH-1	8.4	0.35	0.20	2.94	1.68	12.88	7.36	95%	0.15	0.64	0.37
IDI	BH-1 through BH-6	46.4	0.35	0.20	16.24	9.28	71.13	40.65	95%	0.81	3.56	2.03
RETAIL	BH-7	8.4	0.35	0.20	2.94	1.68	12.88	7.36	95%	0.15	0.64	0.37
Totals					22.12	12.64	96.89	55.36		1.11	4.84	2.77

Notes

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 applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". In the absence of valid PM2.5 emission factors, it is assumed that PM 2.5 emissions are equal to PM10 emissions.

** Emission Factors are from FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Pollutants, (August 1995), SCC 3-07-008-03 (log sawing at a sawmill operation).

Methodology

PTE of PM/PM10/PM2.5 (lbs/hour) = Emission Factor (lb/ton) x Maximum Capacity (ton/hour)

PTE of PM/PM10/PM2.5 (tons/year) = PTE of PM/PM10/PM2.5 (lbs/hour) x 8760 (hours/year) x (1 ton/2000 pounds)

Appendix A.1: Emission Calculations
Unlimited Potential to Emit (PTE) PM, PM10 and PM2.5
Non-Fugitive (ductable) Emissions from the
Wood Grinding and Ground Wood Conveying and Handling

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Wood Grinding Operations			Emission Factors (lbs/ton)		Uncontrolled PTE				After Control		
Unit ID	Process	Maximum Capacity (tons/hour)	PM	PM10/PM2.5*	PM (lbs/hr)	PM10/PM2.5 (lbs/hr)	PM (tons/yr)	PM10/PM2.5 (tons/yr)	Control Efficiency (%)	PTE of PM (tons/yr)	PTE of PM10/PM2.5 (tons/yr)
CH-HOG ^(a)	Cole Hardwood Wood Hog grinder	8.4	0.35	0.20	2.94	1.68	12.88	7.36	99%	0.13	0.07
IDI-HOG1 ^(a)	IDI Wood Hog grinder #1	46.4	0.35	0.20	16.24	9.28	71.13	40.65	99%	0.71	0.41
IDI-HOG2 ^(a)	IDI Wood Hog grinder #2	92.8	0.35	0.20	32.48	18.56	142.26	81.29	99%	1.42	0.81
Totals					51.66	29.52	226.27	129.30		2.26	1.29

Waste Wood Conveying and Handling			Uncontrolled PTE					
Unit ID	Process	Maximum Capacity (ton/hour)	PM	PM10/PM2.5*	PM (lbs/hr)	PM10/PM2.5 (lbs/hr)	PM (tons/yr)	PM10/PM2.5 (tons/yr)
CH-WWBCS ^(b)	Belt conveying of wood waste to CH-HOG	8.4	0.0030	0.00110	0.025	0.01	0.11	0.04
IDI-WWBCS ^(b)	Belt conveying of wood waste to IDI-HOG1 and IDI-HOG2	92.8	0.0030	0.00110	0.28	0.10	1.22	0.45
Totals					0.30	0.11	1.33	0.49

Ground Wood Conveying and Storage			Emission Factors (lbs/ton)		Uncontrolled PTE				After Integral Cyclone Control					
Unit ID	Process	Maximum Capacity (ton/hour)	PM	PM10/PM2.5*	PM (lbs/hr)	PM10/PM2.5 (lbs/hr)	PM (tons/yr)	PM10/PM2.5 (tons/yr)	PM Control Efficiency (%)	PTE of PM (tons/yr)	PM10 Control Efficiency (%)	PTE of PM10 (tons/yr)	PM2.5 Control Efficiency (%)	PTE of PM2.5 (tons/yr)
Pneumatic Conveying and Silo Loading														
CH-GWPCS ^{(c), (d)}	Pneumatic conveying of sawdust from CH-HOG to storage silo CH-SILO1 and silo loading	8.4	1.00	0.36	8.40	3.02	36.79	13.25	70%	11.04	30%	9.27	10%	11.92
IDI-GWPCS1 ^{(c), (d)}	Pneumatic conveying of sawdust from IDI-HOG1 to storage silo IDI-SILO1 and silo loading	46.4	1.00	0.36	46.40	16.70	203.23	73.16	70%	60.97	30%	51.21	10%	65.85
IDI-GWPCS2 ^{(c), (d)}	Pneumatic conveying of sawdust from IDI-HOG2 to storage silo IDI-SILO2 and silo loading	92.8	1.00	0.36	92.80	33.41	406.46	146.33	70%	121.94	30%	102.43	10%	131.69
Subtotal Pneumatic Conveying and Silo Loading					147.60	53.14	646.49	232.74		193.95		162.91		209.46
Auger Conveying														
CH-GWACS ^{(c), (e)}	Auger conveyor from storage silo CH-SILO1 to BOILER1 & BOILER2 auger feed system, drop point	1.78	1.00	0.36	1.78	0.64	7.77	2.80	n/a	7.77	n/a	2.80	n/a	2.80
IDI-GWACS ^{(c), (e)}	Auger conveyor from storage silo IDI-SILO1 to BOILER3 auger feed system, drop point	1.26	1.00	0.36	1.26	0.45	5.50	1.98	n/a	5.50	n/a	1.98	n/a	1.98
Subtotal Auger Conveying:					3.03	1.09	13.28	4.78		13.28		4.78		4.78
Totals					150.63	54.23	659.76	237.52	0	207.22	0	167.69	0	214.24

Notes

n/a = not applicable

The grinders produce ground wood of a size and consistency of sawdust.

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". In the absence of valid PM2.5 emission factors, it is assumed that PM 2.5 emissions are equal to PM10 emissions.

- (a) Emission Factors are from FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Pollutants, (August 1995), SCC 3-07-008-03 (log sawing at a sawmill operation).
- (b) Emission Factors are from AP 42-11.19.2 Crushed Stone Processing and Pulverized Mineral Processing, Table 11.19.2-2 Emission Factors for Crushed Stone (English Units), Emission Factors for Crushed Stone Processing Operations (lb/ton), August 2004, SCC 3-05-020-06, (uncontrolled) Conveyor Transfer Point.
- (c) Emission Factors are from Fire Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC 3-07-008-03 (sawdust pile handling at a sawmill operation).
- (d) The pneumatic conveying systems are each equipped with an integral cyclone collector and airlock.
- (e) Maximum Capacity (ton/hour) is inherently limited by the ability of the boilers to accept fuel. This is an operational bottleneck. See the Operational Bottleneck section of the TSD for more detail.
- (f) Control Efficiency from EPA CICA Air Pollution Control Technology Fact Sheet: Cyclones (EPA-452/F-03-005).

Methodology

PTE of PM/PM10/PM2.5 (lbs/hour) = Emission Factor (lb/ton) x Maximum Capacity (ton/hour)

PTE of PM/PM10/PM2.5 (tons/year) = PTE of PM/PM10/PM2.5 (lbs/hour) x 8760 (hours/year) x (1 ton/2000 pounds)

Appendix A.1: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Bark/Bark and Wet Wood
Three (3) Wood-fired Boilers

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Emission Unit ID	Heat Input Capacity (MMBtu/hr)	Higher Heating Value (MMBtu/ton)	Charging rate (tons/hr)	Charging rate (tons/day)
BOILER1	10.0	16.0	0.63	15.00
BOILER2	18.4	16.0	1.15	27.60
BOILER3	20.1	16.0	1.26	30.15
Totals:	48.5		3.03	72.75

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.56	0.517	0.447	0.025	0.22	0.013	0.6
BOILER1 Potential Emissions in tons/yr	24.53	22.64	19.58	1.10	9.64	0.57	26.28
BOILER2 Potential Emissions in tons/yr	45.13	41.67	36.02	2.01	17.73	1.05	48.36
BOILER3 Potential Emissions in tons/yr	49.30	45.52	39.35	2.20	19.37	1.14	52.82
Total Potential Emissions in tons/yr	119.0	109.8	95.0	5.3	46.7	2.8	127.5

Notes

The Higher Heating Value (HHV) of the wood fuel (MMBtu/ton) is from AP 42-1.6 Wood Residue Combustion In Boilers, section 1.6.1 General. The values generally range between 4,500 Btu/lb of fuel on a wet as-fired basis, to 8,000 Btu/lb for dry wood. Since the ground wood combusted in the wood-fired boilers is repurposed waste wood (scrap) from the woodworking operations, and was kiln dried, 8,000 Btu/lb has been used. This value has been converted to MMBtu/ton.

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

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

**The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

Methodology

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers.

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Hazardous Air Pollutants (HAPs)

	Selected Hazardous Air Pollutants						Total HAPs
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Manganese	
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03	1.6E-03	
BOILER1 Potential Emissions in tons/yr	0.18	0.18	0.19	0.83	0.08	0.07	1.54
BOILER2 Potential Emissions in tons/yr	0.32	0.34	0.35	1.53	0.15	0.13	2.83
BOILER3 Potential Emissions in tons/yr	0.35	0.37	0.39	1.67	0.17	0.14	3.09
Total Potential Emissions in tons/yr	0.85	0.90	0.94	4.06	0.41	0.34	7.49

Methodology

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers.

These factors include the six (6) HAPs with the highest AP-42 emission factors.

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

(modified 12/18 hd)
woodwaste.xls (created 9/01 RLM)

**Appendix A.1: Emissions Calculations
Volatile Organic Compound (VOC) and Particulate Emissions
from Automated Surface Coating Line (SC-1)**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Material	Density (lbs/gal)	Weight % Volatiles (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Material Usage (gal/day)	Maximum Throughput Capacity (board ft/hr)	Material Usage (gal/board ft)	VOC (lbs/gal)	VOC (lbs/gal) Less Water	VOC Emissions (lbs/hr)	VOC Emissions (lbs/day)	VOC Emissions (tons/yr)	Particulate Emissions (tons/yr)	Transfer Efficiency (%)
W/R Clear Spray Stain Base S67TH505 ^(a)	8.16	89.8%	72.9%	16.9%	70.7%	210.0	24,000	0.00036	1.38	4.71	12.07	289.60	52.85	7.97	75%
Ultracare W/B U.V. Topcoat V86FH519 ^(a)	8.77	61.0%	60.0%	1.0%	64.8%	108.0	24,000	0.00019	0.09	0.25	0.39	9.47	1.73	16.85	75%

Note:

(a) Surface coating is HAPs-free.

Methodology:

Weight % Organics = Weight % Volatiles (H2O & Organics) - Weight % Water

Material Usage (gal/board ft) = (1 hr/ 24,000 board ft) * (1 day/ 24 hrs) * Material Usage (gal/day)

VOC (lbs/gal) = Density (lb/gal) * Weight % Organics

VOC (lbs/gal) Less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

VOC Emissions (lbs/hr) = Material Usage (gal/board ft) * Maximum Capacity (board ft/hr) * VOC (lbs/gal)

VOC Emissions (lbs/day) = Material Usage (gal/board ft) * Maximum Capacity (board ft/hr) * VOC (lbs/gal) * (24 hrs/ day)

VOC Emissions (tons/yr) = Material Usage (gal/board ft) * Maximum Capacity (board ft/hr) * VOC (lbs/gal) * (24 hrs/ day) * (365 day/ yr) * (1 ton/ 2000 lbs)

Uncontrolled Particulate Emissions (tons/yr) = Density (lbs/gal) * Material Usage (gal/board ft) * Maximum Capacity (board ft/hr) * (1- Weight % Volatiles) * (1-Transfer Efficiency) * (8760 hrs/ yr) * (1 ton/ 2000 lbs)

Controlled Particulate Emissions (tons/yr) = Density (lbs/gal) * Material Usage (gal/board ft) * Maximum Capacity (board ft/hr) * (1- Weight % Volatiles) * (1-Transfer Efficiency) * (8760 hrs/ yr) * (1 ton/ 2000 lbs) * (1 - Control Efficiency)

Uncontrolled PTE	12.46	299.07	54.58	24.83
PM Control Efficiency =				90%
Controlled PTE	12.46	299.07	54.58	2.48

**Appendix A.1: Emissions Calculations
Volatile Organic Compound (VOC) and
Hazardous Air Pollutants (HAPs) Emissions
Twenty (20) Wood Drying Kilns**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Process	Maximum Throughput* (mbf/month/kiln)	Maximum Throughput (mbf/yr)	Thickness of 3/8" Veneer (inches)	Conversion mbf to MSF of 3/8"	Maximum Throughput (MSF of 3/8"/yr)
1 Kiln (worst-case batch)	144	1,728	0.375	2.67	4,608
Total for all 20 kilns	2,880	34,560	0.375	2.67	92,160

Criteria Pollutants	Potential To Emit (tons/year)					
	PM	PM10	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MSF of 3/8") (heated zone)**	NA	NA	NA	NA	0.28	0.0088
Emission Factor (lb/MSF of 3/8") (cooling zone)**	NA	NA	NA	NA	0.72	0.099
1 Kiln (worst-case batch)	NA	NA	NA	NA	2.30	0.25
Total for all 20 kilns	NA	NA	NA	NA	46.08	4.97

Hazardous Air Pollutants (HAPs)	Potential To Emit (tons/year)				
	Acetaldehyde	Formaldehyde	Methanol	MIBK	Phenol
Emission Factor (lb/MSF of 3/8") (heated zone)**	0.0043	0.0011	0.041	0.0022	0.003
Emission Factor (lb/MSF of 3/8") (cooling zone)**	0.032	0.0065	0.021	0.029	0
1 Kiln (worst-case batch)	0.08	0.02	0.14	0.07	0.01
Total for all 20 kilns	1.67	0.35	2.86	1.44	0.14
Potential To Emit Total HAPs (tons/year)					6.46
Potential To Emit "Worst" Single HAP (tons/year)					2.86

Notes

* Maximum Throughput reported by the source as 1,300,000 board feet per batch, or 2,000,000 board feet/month, combined. Additionally, the "worst case" maximum throughput capacity of the largest kiln is 144,000 board feet (144 mbf) per batch. However, since Cole Hardwood, Inc. does not know the worst case maximum throughput capacity of each kiln, the "worst case" maximum throughput capacity of the largest kiln has been used to calculate the PTE from each kiln.

**Emission factors are from AP-42 Chapter 10.5 (Plywood Manufacturing), Tables 10.5-2 and 10.5-3 (dated 01/02), for indirect heated, heated zones, hardwood (SCC # 3-07-007-56) and indirect heated, cooling section, hardwood (SCC # 3-07-007-57) with units of pounds of pollutant per thousand square feet of 3/8-inch thick veneer (lb/MSF 3/8).

Constants

1 mbf = 1,000 board feet = 83.3 cubic feet
1 MSF = 1000 square feet
1 year = 12 months
1 foot = 12 inches

1 board foot (BDFT) = 1 /12 cubic foot = 0.0833 cubic feet
MSF of 3/8" = 1000 square feet of 0.375" thick veneer
= [1,000 ft * 1 ft * 3/8 in * 1 ft/12 in] = 31.25 cubic feet

Abbreviations

NA = Not Available. There are no emission factors for PM, PM10/PM2.5, or SO₂ for indirect-fired hardwood drying processes. The NO_x emission factor is listed in AP 42 as ND (no data available).
MEK = Methyl ethyl ketone MIBK = Methyl isobutyl ketone

Methodology

Maximum Throughput (mbf/month) = [2,000,000 bdf/mo] * [1 mbf / 1000 bdf] * [1/20 kilns]
Maximum Throughput (mbf/yr) = [Maximum Throughput (mbf/month)] * [12 months / yr]
Conversion mbf to MSF of 3/8" = [(1000 ft) * (1 ft) * (1 in) * (1 ft/12 in) / mbf] * [MSF of 3/8" / (1000 ft) * (1 ft) * ((Thickness of 3/8" Veneer (in)) * (1 ft/12 in))]
Maximum Throughput (MSF of 3/8"/yr) = [Maximum Throughput (mbf/yr) * Conversion mbf to MSF of 3/8"]
PTE (tons/year) = [Maximum Throughput (MSF of 3/8"/year)] * [Emission Factor (lb/MSF of 3/8")] * [ton/2000 lbs]

Appendix A.1: Emissions Calculations
Volatile Organic Compound (VOC), Particulate, and Hazardous Air Pollutant (HAP) Emissions
From Surface and End Coating Operations STENCIL and GREENSHED

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Emission Unit ID	Coating Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Non-Volatiles (solids)	Maximum Coating Usage (gal/day) ^(a)	Maximum Coating Usage (gal/hr)	Pounds VOC per gallon of coating	Potential VOC lbs/hour	Potential VOC lbs/day	Potential VOC tons/yr	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency ^(b)	Methanol Potential (tons/yr) ^(c)
STENCIL	GEMPAINT ^{(c), (d)}	8.51	7.20%	0.0%	7.2%	91.0%	14.40	0.60	0.61	0.37	8.83	1.61	1.04	0.67	95%	1.61
GREENSHED	Anchorseal 2 ^(e)	8.18	---	---	0.0%	---	28.80	1.20	0.00	0.00	0.00	0.00	2.15	0.00	95%	0.00
Total Potential Emissions										0.37	8.83	1.61	3.19			1.61

NOTES

Constant: Density of Water = 8.345406 lbs H2O/gal H2O

(a) Maximum coating usage given as gallons used per 24hr day.

Additionally, the maximum throughput capacity for the STENCIL Line (EU03-1) is reported as 4,000 board feet (16,800 pounds) per hour, and for the GREENSHED Line (EU03-2) as 16,000 board feet (92,800 pounds) per hour.

(b) Transfer efficiency is estimated to be 95% because the spray guns are non-atomizing spray applicators. Also, the board ends being sprayed are stacked, so there are very few edges.

(c) All VOC is present as the HAP methanol.

(d) GEMPAINT is a water-based paint containing methanol when winterized to prevent freezing. To conservatively estimate emissions, it has been assumed only winterized GEMPAINT is used.

(e) Anchorseal 2 is a water-based emulsion/aqueous emulsion of paraffin wax containing no VOC or HAP.

METHODOLOGY

Maximum Coating Usage (gal/hr) = Maximum Coating Usage (gal/day) * (1 workday / 8hrs)

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.1: Emission Calculations
Volatile Organic Compound (VOC), Particulate, and Hazardous Air Pollutant (HAP) Emissions
from the Aerosol Spray Coating Operations

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Material	Density (lb/gal)	Maximum Material Usage (cans/mo)	Maximum Material Usage (gal/mo)	Maximum Material Usage (gal/day)	Maximum Material Usage (gal/yr)	Transfer Efficiency (%)	Weight % Solids	PM Emissions (lbs/hr)	PM Emissions (ton/yr)	Weight % VOCs	VOC Emissions (lbs/hr)	VOC Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (lbs/hr)	Toluene Emissions (ton/yr)
Aerosol Spray	7.09	20.0	1.72	0.06	20.63	65%	37.5%	0.016	0.070	37.5%	0.046	0.200	14.0%	0.017	0.075

NOTES

Usage reported at 20 cans/month. According to the source, a typical can holds 11 oz of coating.

To form a conservative estimate, it is assumed that coatings are applied 5 days per week and 4 weeks per month, or 20 days per month, and 5 hrs per day.

The data used to calculate PTE is typical for aerosol spray coatings used for marking purposes. The HAP displayed is the worst case from several different coatings.

Constant: 1 gallon = 128 fluid ounces.

This coating is applied by hand using an aerosol spray can. The transfer efficiency is assumed to be 65 %.

PM10 and PM 2.5 emissions are assumed equal to PM emissions.

METHODOLOGY

Material Usage (gal/mo) = [20 cans/month * 11 oz/can * 1 gallon/128 oz]

Maximum Material Usage (gal/day) = [Material Usage (gal/yr) * (1yr/365 days)]

Material Usage (gal/yr) = Material Usage (gal/mo) * 12 months/yr

PM Emission rate (lbs/hr) = [Density (lb/gal) * (Maximum Material Usage (gal/mo) / ((20 workdays/mo) * (5 workhrs/day))) * (1 - Transfer Efficiency (%)) * Weight % Solids]

PM Emission rate (tons/yr) = [PM Emission rate (lbs/hr) * (8760 hrs/yr) * (1ton/2000lbs)]

VOC/HAP Emission rate (lbs/hr) = [(Maximum Material Usage (gal/mo) / ((20 workdays/mo) * (5 workhrs/day))) * Weight %]

VOC/HAP Emission rate (tons/yr) = [OC/HAP Emission rate (lbs/hr) * (8760 hrs/yr) * (1ton/2000lbs)]

Appendix A.1: Emissions Calculations
Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) Emissions
From Solvent/Cleaning/Degreasing Operations

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Solvent Used	Solvent Density (lbs/gal)	Maximum Annual Material Usage (replacement volume) (gal/yr)	Weight % VOCs	VOC PTE (tons/year)	Weight % Toluene	Toluene Emissions (ton/yr)
Safety Kleen Premium Gold Solvent	6.70	145.0	100%	0.49	0.10%	4.86E-04

Notes

Total emissions based on rated capacity at 8,760 hours/year.

Maximum Annual Material Usage provided by the source.

Material Density and VOC Content (weight %) obtained from product MSDS sheets, where applicable, else from the source.

The Safety Kleen Premium Gold Solvent consists of 100% petroleum distillates, hydrotreated light (CAS 64742-47-8), which contain 0.1% toluene. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).

Solvent is applied using flow coating and/or hand wipe application methods, therefore particulate emissions are assumed negligible.

Methodology

Estimated Annual Hours of Operation (hrs/yr) = [8 hrs/day * 5 days/week * 50 weeks/year]

Maximum Material Usage (gal/hr) = [Annual Material Usage (gal/yr) / (Estimated Annual Hours of Operation (hrs/year))]

VOC PTE (tons/yr) = [Solvent Density (lbs/gal) * Maximum Material Usage (gal/hr) * Weight % VOCs * 8760 hrs/yr * 1 ton/2000 lbs]

HAPs PTE (tons/yr) = [Solvent Density (lbs/gal) * Maximum Material Usage (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs]

**Appendix A.1: Emissions Calculations
Volatile Organic Compound (VOC) Emissions
From the Adhesive Operations**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Emission Unit ID	Product Density (lb/gal)	VOC Content (Less Water & Exempt Solvents) (g VOC/L product)	VOC Content (Less Water & Exempt Solvents) (Wt. %)	Maximum Monthly Material Usage ^(a) (gal/month)	Maximum Daily Material Usage (gal/day)	Maximum Annual Material Usage (gal/yr)	Potential VOC Emissions (lb/hr)	Potential VOC Emissions (tpy)
Woodbond 75 ^{(b), (c)}	9.6	6.7	0.58%	1,500	49	18,000	0.11	0.50
Total (tons/yr):							0.11	0.50

NOTES

- (a) Maximum Monthly Material Usage (gal/month), provided by the source.
(b) Product composition is based on data available in product material safety data sheets. Product is HAPs free
(c) The product is a thick, aliphatic emulsion applied directly and not via spray gun. No particulate emissions are expected.

METHODOLOGY

Constants: 8.345406 lb H₂O/gal H₂O 3.78541 L/gal
453.592 g/lb 12 months/yr

VOC Content (Less Water & Exempt Solvents) (Wt. %) = VOC Content (Less Water & Exempt Solvents) (g VOC/L product) / 453.6 (g/lb) x 3.785 (L/gal) / Product Density (lb/gal)

Maximum Daily Material Usage (gal/day) = [Maximum Annual Material Usage (gal/yr) * (1yr/365 days)]

Maximum Annual Material Usage (gal/yr) = Maximum Annual Material Usage gal/month * 12 Months

VOC Emissions (tpy) = Product Density (lb/gal) x Maximum Annual Usage (gal/yr) / 2,000 (lb/ton) x VOC Content (Less Water & Exempt Solvents) (Wt. %)

VOC Emissions (lb/hr) = VOC Emissions (tpy) x 2,000 (lb/ton) / 8,760 (hr/yr)

Appendix A.1: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Diesel Fuel-fired Boiler (DB1)

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Heat Input Capacity Potential Throughput
MMBtu/hr kgals/year S = Weight % Sulfur
4.2 262.8 0.5

	Pollutant						
	PM*	PM10	direct PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	2.4	2.1	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.26	0.31	0.28	9.33	2.63	0.04	0.66

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

Hazardous Air Pollutants (HAPs)

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	7.4E-05	5.5E-05	5.5E-05	5.5E-05	1.7E-04

	HAPs - Metals (continued)				Total HAPs
	Mercury	Manganese	Nickel	Selenium	
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05	9.0E-04
Potential Emission in tons/yr	5.5E-05	1.1E-04	5.5E-05	2.8E-04	

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A.1: Emission Calculations
Fugitive Emissions from Ground Wood Conveying and Handling

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^M \cdot (U/5)^{1.3} \cdot (M/2)^{1.4}$$

where: E_f = Emission Factor (lb/ton)

k (PM) =	0.74	= particle size modifier (0.74 assumed for aerodynamic diameter $\leq 100\mu\text{m}$)
k (PM10) =	0.35	= particle size modifier (0.35 assumed for aerodynamic diameter $\leq 10\mu\text{m}$)
k (PM2.5) =	0.053	= particle size multiplier (0.053 assumed for aerodynamic diameter $\leq 2.5\mu\text{m}$)
U =	9.1	= annual mean wind speed (source: NOAA, 2015*)
M =	6.0	= material % moisture content of kiln dried hardwood sawdust (Source: Purdue University**)
E_f (PM) =	1.11E-03	lb PM/ton of material handled
E_f (PM10) =	5.24E-04	lb PM10/ton of material handled
E_f (PM2.5) =	7.94E-05	lb PM2.5/ton of material handled

CH-HOG Ground Wood Conveying and Handling - fugitives

Maximum Material Handling Throughput = tons/hr

Type of activity	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/yr)
Loading ground wood onto truck for delivery to shed	0.04	0.02	2.9E-03
Truck unloading of ground wood at shed	0.04	0.02	2.9E-03
Front-end loader dumping of ground wood into shed	0.04	0.02	2.9E-03
Loading ground wood from shed onto truck for delivery to boilers	0.04	0.02	2.9E-03
Truck unloading of ground wood at boilers	0.04	0.02	2.9E-03
Loading ground wood onto truck for delivery to Silo S2	0.04	0.02	2.9E-03
Truck unloading of material (sawdust) at Silo S2	0.04	0.02	2.9E-03
Front-end loader dumping of material (sawdust) into feedbin for Silo S2	0.04	0.02	2.9E-03
Loading sawdust from Silo S2 onto truck for delivery to boilers	0.04	0.02	2.9E-03
Truck unloading of ground wood at boilers	0.04	0.02	2.9E-03
Loading ground wood onto truck for delivery to storage pile	0.04	0.02	2.9E-03
Truck unloading of ground wood onto storage pile	0.04	0.02	2.9E-03
Loading ground wood from storage pile onto truck for delivery to boilers	0.04	0.02	2.9E-03
Truck unloading of ground wood at boilers	0.04	0.02	2.9E-03
Total (tons/yr)	0.57	0.27	0.04

IDI-HOG1 and IDI-HOG2 Ground Wood Conveying and Handling - fugitives

Maximum Material Handling Throughput = tons/hr

Type of activity	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/yr)
Loading ground wood onto truck for delivery to shed	0.68	0.32	0.05
Truck unloading of ground wood at shed	0.68	0.32	0.05
Front-end loader dumping of ground wood into shed	0.68	0.32	0.05
Loading ground wood from shed onto truck for delivery to boilers	0.68	0.32	0.05
Truck unloading of ground wood at boilers	0.68	0.32	0.05
Loading ground wood onto truck for delivery to storage pile	0.68	0.32	0.05
Truck unloading of ground wood onto storage pile	0.68	0.32	0.05
Loading ground wood from storage pile onto truck for delivery to boilers	0.68	0.32	0.05
Truck unloading of ground wood at boilers	0.68	0.32	0.05
Total (tons/yr)	2.03	0.96	0.15

Total Conveying and Handling PTE (tons/year)	2.60	1.23	0.19
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Methodology

The grinders produce ground wood of a size and consistency of sawdust.

Potential to emit (tons/yr) = (Maximum Material Handling Throughput (tons/hr)) * (Emission Factor (lb/ton)) * (1 ton/2000lbs) * (8760 hrs/1yr)

*Annual mean wind speed from "Comparative Climactic Data", National Climactic Data Center, NOAA, 2015 (Southbend, IN)

<http://www1.ncdc.noaa.gov/pub/data/ccd-data/CCD-2015.pdf>

** Controlling Moisture Content in Stored Lumber, Purdue University Cooperative Extension Service, West Lafayette, IN 47907, FNR-403-W (https://www.extension.purdue.edu/extmedia/FNR/FNR_403_W.pdf)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10um)
 PTE = Potential to Emit

The particle size multiplier in the equation, k, varies with aerodynamic particle size range, as follows:

Aerodynamic Particle Size Multiplier (k) For Equation 1				
< 30 um	< 15 um	< 10 um	< 5 um	< 2.5 um
0.74	0.48	0.35	0.2	0.053 ^a

^a Multiplier for < 2.5 um taken from Reference 14.

**Appendix A.1: Emissions Calculations
Fugitive Particulate Emissions
from Ash Handling**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Ash is removed from each boiler by hand using a shovel and placed into a wheelbarrow. This activity occurs inside the building. The wheelbarrow is dumped into a front bucket loader, which then takes the ash to a storage pile. Periodically, the ash pile is loaded onto a truck and taken off-site for disposal.

Ash Capacity*

Heat Input Capacity of Boiler (MMBtu/hr)	Higher Heating Value of Wood (Btu/lb)	Potential Wood Combustion Rate (lbs/hr)	Ash in Wood (%)	Potential Ash Capacity (tons/hr)
10.00	8,000	1,250.0	10%	0.06
18.40	8,000	2,300.0	10%	0.12
20.10	8,000	2,512.5	10%	0.13
Total				0.30

Notes

* Ash conveyance system capacity is based on the amount of ash generated by the associated wood-fired boiler. The Higher Heating Value (HHV) of the wood fuel (MMBtu/ton) is from AP 42-1.6 Wood Residue Combustion In Boilers, section 1.6.1 General. The values generally range between 4,500 Btu/lb of fuel on a wet as-fired basis, to 8,000 Btu/lb for dry wood. Since the ground wood combusted in the wood-fired boilers is repurposed waste wood (scrap) from the woodworking operations and is kiln dried, 8,000 Btu/lb has been used. This value has been converted to MMBtu/ton.

Methodology

Potential Wood Combustion Rate (lbs/hr) = [Heat Input Capacity of Boiler (MMBtu/hr)] * [1000000 Btu/MMBtu] / [Heat Value of Wood (Btu/lb)]
Potential Ash Capacity (tons/yr) = [Potential Wood Combustion Rate (lbs/hr)] * [10% ash in wood] * [8760 hours/year] / [2000 lbs/ton]

Potential to Emit (PTE) of PM/PM10/PM2.5 from Ash Handling Inside the Building

Process	PM Emission Factor (lb/ton)	PM10/PM2.5 Emission Factor** (lb/ton)	PTE of PM (lbs/hr)	PTE of PM (tons/yr)	PTE of PM10/PM2.5 (tons/yr)
Boiler to wheelbarrow*	3.14	1.10	2.24E-05	9.81E-05	3.44E-05
Total			2.24E-05	9.81E-05	3.44E-05

Notes

*Particulate emissions from boiler to wheelbarrow ash handling were estimated using uncontrolled emission factors for cement supplement unloading to elevated storage silo (SCC 3-05-011-17) from AP-42, Table 11.19.2-2 Emission Factors For Concrete Batching.

**There are no PM2.5 emission factors for Concrete Batching Operations, therefore, PM2.5 emissions are assumed equal to PM10 emissions.

Methodology

Potential to Emit (PTE) (lbs/hr) = [Potential to Emit (PTE) (tons/yr) * (1yr/8760 hrs) * (2000 lbs/ton)]
Potential to Emit (PTE) (tons/yr) = [Potential Ash Capacity (tons/year)] * [Emission Factor (lbs/ton)] * [1 ton/2000 lbs]

Potential to Emit (PTE) of PM/PM10/PM2.5 from Ash Handling Outside the Building (Fugitive)**Batch or Continuous Drop Operations (AP-42 Section 13.2.4)**

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$Ef = k * (0.0032)^{[(U/5)^{1.3} / (M/2)^{1.4}]}$$

where:

Ef =	Emission Factor (lb/ton)	
k (PM) =	0.74	= particle size modifier (0.74 assumed for aerodynamic diameter <=100um)
k (PM10) =	0.35	= particle size modifier (0.35 assumed for aerodynamic diameter <=10um)
k (PM2.5) =	0.053	= particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
U =	9.1	= annual mean wind speed (source NOAA, 2015*)
M =	0.2	= material % moisture content of wood ash (source: see below**)
Ef (PM) =	1.30E-01	lb PM/ton of material handled
Ef (PM10) =	6.13E-02	lb PM10/ton of material handled
Ef (PM2.5) =	9.28E-03	lb PM2.5/ton of material handled

$$\text{Maximum Material Handling Throughput} = \boxed{0.30} \text{ tons/hr}$$

Type of activity	PTE of PM (lbs/hr)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/yr)
Dump wheelbarrow into loader bucket (fugitive)	3.93E-02	1.72E-01	8.14E-02	1.23E-02
Front loader bucket dump onto ash pile (fugitive)	3.93E-02	1.72E-01	8.14E-02	1.23E-02
Loading ash from pile onto truck for disposal (fugitive)	3.93E-02	1.72E-01	8.14E-02	1.23E-02
Total (tons/yr)		0.12	0.52	0.24
			0.04	

Methodology

Potential to Emit (PTE) (lbs/hr) = [Potential to Emit (PTE) (tons/yr) * (1yr/8760 hrs) * (2000 lbs/ton)]

Potential to emit (tons/yr) (PTE) = [(Maximum Material Handling Throughput (tons/hr)) * (Emission Factor (lb/ton)) * (1 ton/2000lbs) * (8760 hrs/1yr)]

*Annual mean wind speed from "Comparative Climactic Data", National Climactic Data Center, NOAA, 2015 (Southbend, IN)

<http://www1.ncdc.noaa.gov/pub/data/ccd-data/CCD-2015.pdf>

** Conference Paper: Physical and chemical properties of wood ash from burning and gasification processes, presented at the Twenty-Sixth International Conference on Solid Waste Technology and Management. At Philadelphia. Published in the Journal of Solid Waste Technology and Management, Volume: Proceedings, 879-887.

https://www.researchgate.net/publication/280723124_Physical_and_chemical_properties_of_wood_ash_from_burning_and_gasification_processes

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10um) PTE = Potential to Emit

**Appendix A.1: Emissions Calculations
Fugitive Particulate Emissions
from Sawdust Loading**

Company Name: Cole Hardwood, Inc.
Source Address: 1611 West Market Street Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Sawdust is gravity-fed into a semi-truck from a silo at the Logansport Facility. Each semi-truck has a capacity of 40,000 pounds. One truck can be loaded each hour. This activity occurs outside the building.

Potential to Emit (PTE) of PM/PM10/PM2.5 from Sawdust Handling Outside the Building (Fugitive)

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^M \cdot (U/5)^{1.3} \cdot (M/2)^{1.4}$$

where:

E_f	=	Emission Factor (lb/ton)
k (PM)	=	0.74 = particle size modifier (0.74 assumed for aerodynamic diameter <=100um)
k (PM10)	=	0.35 = particle size modifier (0.35 assumed for aerodynamic diameter <=10um)
k (PM2.5)	=	0.053 = particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
U	=	9.1 = annual mean wind speed (source: NOAA, 2015*)
M	=	6.0 = material % moisture content of kiln dried hardwood sawdust (Source: Purdue University**)
E_f (PM)	=	1.11E-03 lb PM/ton of material handled
E_f (PM10)	=	5.24E-04 lb PM10/ton of material handled
E_f (PM2.5)	=	7.94E-05 lb PM2.5/ton of material handled

Maximum Material Handling Throughput = 20 tons/hr

Type of activity	PTE of PM (lb/hr)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/yr)
Loading sawdust from silo into semi-truck (fugitive)	0.022	0.097	0.046	7.0E-03
Total (tons/yr)	0.02	0.10	0.05	7.0E-03

Methodology

Potential to Emit (PTE) (lbs/hr) = [Potential to Emit (PTE) (tons/yr) * (1yr/8760 hrs) * (2000 lbs/ton)]
 Potential to emit (PTE) (tons/yr) = [(Maximum Material Handling Throughput (tons/hr)) * (Emission Factor (lb/ton)) * (1 ton/2000lbs) * (8760 hrs/1yr)]
 *Annual mean wind speed from "Comparative Climactic Data", National Climactic Data Center, NOAA, 2015 (Southbend, IN)
<http://www1.ncdc.noaa.gov/pub/data/ccd-data/CCD-2015.pdf>
 ** Controlling Moisture Content in Stored Lumber, Purdue University Cooperative Extension Service, West Lafayette, IN 47907, FNR-403-W
 (https://www.extension.purdue.edu/extmedia/FNR/FNR_403_W.pdf)

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10um) PTE = Potential to Emit

**Appendix A.1: Emissions Calculations
Material Storage Piles**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

$$E_f = 1.7 \cdot (s/1.5) \cdot (365-p) / 235 \cdot (f/15)$$

where E_f = emission factor (lb/acre/day)
 s = silt content (wt %)
 p = 125 days of rain greater than or equal to 0.01 inches
 f = 15 % of wind greater than or equal to 12 mph

Material	Silt Content (wt %) ^a	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)	Unlimited PTE of PM (tons/yr)	Unlimited PTE of PM10 (tons/yr) ^b
Sawdust	13	15.05	0.021	0.058	0.020
Ash - dry	80	92.60	0.018	0.310	0.109
Ash - wet	80	92.60	0.018	0.310	0.109
Totals				0.37	0.13

Methodology

Unlimited PTE of PM (tons/yr) = [Emission Factor (lb/acre/day)] * [Maximum Pile Size (acres)] * (ton/2000 lbs) * (8760 hours/yr)

Unlimited PTE of PM10 (tons/yr) = [Unlimited PTE of PM (tons/yr)] * 35%

^a Silt content values obtained from AP-42 Table 13.2.4-1 (dated 1/95), for flue dust (sawdust) and fly ash.

^b PM2.5 emissions are assumed equal to PM10 emissions.

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

PTE = Potential to Emit

Appendix A.1: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type of one-way trip	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Cole Hardwood - Freight Truck - Inbound full	10.0	1.0	10.0	40.0	400.0	0.1136	1.1	414.6
Cole Hardwood - Freight Truck - Outbound empty	10.0	1.0	10.0	15.0	150.0	0.1136	1.1	414.6
Cole Hardwood - Freight Truck - Inbound empty	10.0	1.0	10.0	15.0	150.0	0.2083	2.1	760.3
Cole Hardwood - Freight Truck - Outbound full	10.0	1.0	10.0	40.0	400.0	0.2083	2.1	760.3
Cole Hardwood - Kiln Loading full	1.0	10.0	10.0	29.5	295.0	0.1750	1.8	638.8
Cole Hardwood - Kiln Loading empty	1.0	10.0	10.0	23.5	235.0	0.1750	1.8	638.8
Cole Hardwood - Kiln Unloading full	1.0	10.0	10.0	29.5	295.0	0.1750	1.8	638.8
Cole Hardwood - Kiln Unloading empty	1.0	10.0	10.0	23.5	235.0	0.1750	1.8	638.8
Front End Loader - Sawdust Handling full	2.0	1.0	2.0	15.0	30.0	0.1250	0.3	91.3
Front End Loader - Sawdust Handling empty	2.0	1.0	2.0	10.0	20.0	0.1250	0.3	91.3
Freight Truck - Sawdust Inbound Empty	4.0	1.0	4.0	18.0	72.0	0.1250	0.5	182.5
Freight Truck - Sawdust Outbound full	4.0	1.0	4.0	20.0	80.0	0.1250	0.5	182.5
Front End Loader - Ash Handling full	2.0	1.0	2.0	15.0	30.0	0.1250	0.3	91.3
Front End Loader - Ash Handling empty	2.0	1.0	2.0	10.0	20.0	0.1250	0.3	91.3
Indiana Dimension - Freight Truck - Inbound full	6.0	1.0	6.0	40.0	240.0	0.1136	0.7	248.8
Indiana Dimension - Freight Truck - Outbound empty	6.0	1.0	6.0	15.0	90.0	0.1136	0.7	248.8
Totals			108.0		2,742.0		16.8	6,132.4

Average Vehicle Weight Per Trip = 25.4 tons/trip
 Average Miles Per Trip = 0.16 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	25.4	25.4	25.4	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.356	0.471	0.1156	lb/mile
Mitigated Emission Factor, Eext =	2.154	0.431	0.1057	lb/mile

Type of one-way trip	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Cole Hardwood - Inbound full	0.49	0.10	0.02	0.45	0.09	0.02
Cole Hardwood - Outbound empty	0.49	0.10	0.02	0.45	0.09	0.02
Cole Hardwood - Inbound empty	0.90	0.18	0.04	0.82	0.16	0.04
Cole Hardwood - Outbound full	0.90	0.18	0.04	0.82	0.16	0.04
Cole Hardwood - Kiln Loading full	0.75	0.15	0.04	0.69	0.14	0.03
Cole Hardwood - Kiln Loading empty	0.75	0.15	0.04	0.69	0.14	0.03
Cole Hardwood - Kiln Unloading full	0.75	0.15	0.04	0.69	0.14	0.03
Cole Hardwood - Kiln Unloading empty	0.75	0.15	0.04	0.69	0.14	0.03
Front End Loader - Sawdust Handling full	0.11	0.02	0.01	0.10	0.02	0.00
Front End Loader - Sawdust Handling empty	0.11	0.02	0.01	0.10	0.02	0.00
Freight Truck - Sawdust Inbound Empty	0.21	0.04	0.01	0.20	0.04	0.01
Freight Truck - Sawdust Outbound full	0.21	0.04	0.01	0.20	0.04	0.01
Front End Loader - Ash Handling full	0.11	0.02	0.01	0.10	0.02	0.00
Front End Loader - Ash Handling empty	0.11	0.02	0.01	0.10	0.02	0.00
Indiana Dimension - Inbound full	0.29	0.06	0.01	0.27	0.05	0.01
Indiana Dimension - Outbound empty	0.29	0.06	0.01	0.27	0.05	0.01
Totals	7.22	1.44	0.35	6.60	1.32	0.32

Methodology

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

Abbreviations

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

**Appendix A.1: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type of one-way trip	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Freight Truck - Inbound full	10.0	1.0	10.0	40.0	400.0	0.05682	0.6	207.4
Freight Truck - Inbound empty	10.0	1.0	10.0	15.0	150.0	0.05682	0.6	207.4
Cole Hardwood - Kiln Loading full	1.0	10.0	10.0	29.5	295.0	0.07500	0.8	273.8
Cole Hardwood - Kiln Loading empty	1.0	10.0	10.0	23.5	235.0	0.07500	0.8	273.8
Cole Hardwood - Kiln Unloading full	1.0	10.0	10.0	29.5	295.0	0.07500	0.8	273.8
Cole Hardwood - Kiln Unloading empty	1.0	10.0	10.0	23.5	235.0	0.07500	0.8	273.8
Front End Loader - Sawdust Handling full	2.0	1.0	2.0	15.0	30.0	0.12500	0.3	91.3
Front End Loader - Sawdust Handling empty	2.0	1.0	2.0	10.0	20.0	0.12500	0.3	91.3
Freight Truck - Sawdust Inbound Empty	4.0	1.0	4.0	18.0	72.0	1.12500	4.5	1642.5
Freight Truck - Sawdust Outbound full	4.0	1.0	4.0	20.0	80.0	2.12500	8.5	3102.5
Front End Loader - Ash Handling full	2.0	1.0	2.0	15.0	30.0	0.12500	0.3	91.3
Front End Loader - Ash Handling empty	2.0	1.0	2.0	10.0	20.0	0.12500	0.3	91.3
Totals			76.0		1,862		18.1	6,620

Average Vehicle Weight Per Trip = 24.5 tons/trip
Average Miles Per Trip = 0.24 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	8.3	8.3	8.3	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	24.5	24.5	24.5	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

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

Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	9.74	2.77	0.28	lb/mile
Mitigated Emission Factor, $E_{ext} =$	6.40	1.82	0.18	lb/mile

Type of one-way trip	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Cole Hardwood - Inbound full	1.01	0.29	0.03	0.66	0.19	0.02
Cole Hardwood - Inbound empty	1.01	0.29	0.03	0.66	0.19	0.02
Cole Hardwood - Kiln Loading full	1.33	0.38	0.04	0.88	0.25	0.02
Cole Hardwood - Kiln Loading empty	1.33	0.38	0.04	0.88	0.25	0.02
Cole Hardwood - Kiln Unloading full	1.33	0.38	0.04	0.88	0.25	0.02
Cole Hardwood - Kiln Unloading empty	1.33	0.38	0.04	0.88	0.25	0.02
Front End Loader - Sawdust Handling full	0.44	0.13	0.01	0.29	0.08	0.01
Front End Loader - Sawdust Handling empty	0.44	0.13	0.01	0.29	0.08	0.01
Freight Truck - Sawdust Inbound Empty	8.00	2.27	0.23	5.26	1.50	0.15
Freight Truck - Sawdust Outbound full	15.11	4.30	0.43	9.93	2.83	0.28
Front End Loader - Ash Handling full	0.44	0.13	0.01	0.29	0.08	0.01
Front End Loader - Ash Handling empty	0.44	0.13	0.01	0.29	0.08	0.01
Totals	32.24	9.17	0.92	21.20	6.03	0.60

Methodology

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

Abbreviations

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

Appendix A.1: Emissions Calculations
Volatile Organic Compounds and Hazardous Air Pollutants (HAPs) Emissions
From Gasoline Fuel Transfer and Dispensing Operations

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

To calculate evaporative emissions from the gasoline dispensing fuel transfer and dispensing operation emission factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids were used. The total potential emission of VOC is as follows:

Gasoline Throughput* = 10.0 gallons/day
 Gasoline Throughput = 3.65 kgal/yr

Volatile Organic Compounds (VOC)

Emission Source	Emission Factor** (lb/kgal of throughput)	PTE of VOC (tons/yr)
Filling storage tank (splash filling)	11.50	0.0210
Tank breathing and emptying	1.00	0.0018
Vehicle refueling (displaced losses - uncontrolled)	11.00	0.0201
Spillage	0.70	0.0013
Total		0.044

Methodology

* The gasoline throughput was provided by the source as less than 300 gallons per month. To form a conservative estimate it is assumed that there are 30 days in any given month.

**Emission Factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08), Table 5.2-7

Gasoline Throughput (gallons/day) = [300 gal/month * 1 Month/30 days]

Gasoline Throughput (kgal/yr) = [Gasoline Throughput (gallons/day)] * [365 days/yr] * [kgal/1000 gal]

PTE of VOC (tons/yr) = [Gasoline Throughput (kgal/yr)] * [Emission Factor (lb/kgal)] * [ton/2000 lb]

Hazardous Air Pollutants (HAPs)

Volatile Organic HAP	CAS#	Hazardous Air Pollutant (HAP) Content (vapor mass fraction)**	PTE of HAP (tons/yr)
Benzene	71-43-2	0.37%	1.6E-04
n-Hexane	110-54-3	0.34%	1.5E-04
Toluene	108-88-3	0.40%	1.8E-04
m-Xylenes	108-38-3	0.11%	4.9E-05

Total PTE of HAPs (tons/yr) 5.4E-04
PTE of Worst Single HAP (tons/yr) 1.8E-04 (Toluene)

Methodology

**Source: US EPA TANKS Version 4.09 program

PTE of Total HAPs (tons/yr) = [Total HAP Content (% by weight)] * [PTE of VOC (tons/yr)]

PTE of HAP (tons/yr) = [Hazardous Air Pollutant (HAP) Content (vapor mass fraction)] * [PTE of VOC (tons/yr)]

Abbreviations

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutant

PTE = Potential to Emit

**Appendix A.1: Emissions Calculations
PSD Minor Limits**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Wood Grinding

Unit ID	Emission Unit Description	Control Device ID	Maximum Capacity (ton/hour)	Minimum Control Efficiency (%)	Particulate Emission Limits (lbs/hr)			Limited Particulate Emissions (tons/yr)		
					PM	PM10	PM2.5	PM	PM10	PM2.5
CH-HOG	Cole Hardwood Wood Hog grinder	Baghouse BH-8	8.4	0%	2.94	1.66	1.68	12.88	7.36	7.36
IDI-HOG1	IDI Wood Hog grinder #1	Baghouse BH-2	46.4	70%	4.87	2.78	2.78	21.34	12.19	12.19
IDI-HOG2	IDI Wood Hog grinder #2	Baghouse BH-4	92.8	70%	9.74	5.57	5.57	42.68	24.39	24.39
Totals:								76.90	43.94	43.94

Notes

The source can comply with the above-listed PM, PM10, and PM2.5 emission limits using the following control efficiencies (CE):

- CH-HOG: emissions are unlimited for this unit.
- IDI-HOG1: PM, PM10, and PM2.5 using a 70% CE.
- IDI-HOG2: PM, PM10, and PM2.5 using a 70% CE.

Methodology

Particulate Emission Limits (lbs/hr) = PTE (lbs/hr) * (1-(required control efficiency))

Limited Particulate Emissions (tons/yr) = [Particulate Emission Limits (lbs/hr) * 8760 hrs/yr * 1ton/2000lbs]

Ground Wood Conveying and Storage

Emission Unit Description	Control Device ID	Maximum Capacity (ton/hour)	Minimum Control Efficiency (%)	Particulate Emission Limits (lbs/hr)			Limited Particulate Emissions (tons/yr)		
				PM	PM10	PM2.5	PM	PM10	PM2.5
Pneumatic Conveyor CH-GWPCS and Storage Silo CH-SILO1	Baghouse CH-BH	8.4	0%	2.52	2.12	2.12	11.04	9.27	9.27
Pneumatic Conveyor IDI-GWPCS1 and Storage silo IDI-SILO1	Baghouse IDI-BH1	46.4	70%	4.18	3.51	3.51	18.29	15.36	15.36
Pneumatic Conveyor IDI-GWPCS2 and Storage silo IDI-SILO2	Baghouse IDI-BH2	92.8	70%	8.35	7.02	7.02	36.58	30.73	30.73
Totals:							65.91	55.36	55.36

Notes

The source can comply with the above-listed PM, PM10, and PM2.5 emission limits using the following control efficiencies (CE):

- CH-GWPCS and Storage Silo CH-SILO1: emissions are unlimited for this unit.
- IDI-GWPCS1 and Storage silo IDI-SILO1: PM, PM10, and PM2.5 using a 70% CE.
- IDI-GWPCS2 and Storage silo IDI-SILO2: PM, PM10, and PM2.5 using a 70% CE.

Methodology

Particulate Emission Limits (lbs/hr) = PTE (lbs/hr) * (1-(required control efficiency))

Limited Particulate Emissions (tons/yr) = [Particulate Emission Limits (lbs/hr) * 8760 hrs/yr * 1ton/2000lbs]

Wood-fired Boilers

Unit ID	Emission Unit Description	Control Device ID	Maximum Capacity (ton/hour)	Minimum Control Efficiency (%)	Particulate Emission Limits (lbs/hr)			Limited Particulate Emissions (tons/yr)		
					PM	PM10	PM2.5	PM	PM10	PM2.5
BOILER1	10.0 MMBtu/hr Wood-fired Boiler	Multiclone	0.63	0%	5.60	5.17	4.47	24.53	22.64	19.58
BOILER2	18.4 MMBtu/hr Wood-fired Boiler	Multiclone	1.15	70%	3.09	2.85	2.47	13.54	12.50	10.81
BOILER3	20.1 MMBtu/hr Wood-fired Boiler	Multiclone	1.26	70%	3.38	3.12	2.70	14.79	13.65	11.81
Totals:							52.86	48.80	42.19	

Notes

The source can comply with the above-listed PM, PM10, and PM2.5 emission limits using the following control efficiencies (CE):

- BOILER1: emissions are unlimited for this unit.
- BOILER2: PM, PM10, and PM2.5 using a 70% CE.
- BOILER3: PM, PM10, and PM2.5 using a 70% CE.

Methodology

Particulate Emission Limits (lbs/hr) = PTE (lbs/hr) * (1-(required control efficiency))

Limited Particulate Emissions (tons/yr) = [Particulate Emission Limits (lbs/hr) * 8760 hrs/yr * 1ton/2000lbs]

**Appendix A.1: Emissions Calculations
326 IAC Article 6-2 Particulate Emission Limitations
for Sources of Indirect Heating**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

ID#	Maximum Heat Input Capacity (MMBtu/hr) (Q)	Year constructed	Q_T (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation (Pt) (lb/MMBtu)	Applicability Test
BOILER1	10.0	1985	10.0	0.60	0.60	$QT \geq 10$
BOILER2	18.4	1990	32.6	0.44	0.44	$QT \geq 10$
DB1	4.2			0.44	0.44	$QT \geq 10$
BOILER3	20.1	1997	52.7	0.39	0.39	$QT \geq 10$

Methodology

For BOILER1 $Q_T = Q$

For BOILER2 and DB1, the sourcewide $Q_T = Q_{BOILER1} + Q_{BOILER2} + Q_{DB1}$

For BOILER3, $Q_T = Q_{T(BOILER1, BOILER2, DB1)} + Q_{BOILER3}$

If $Q_T < 10$ MMBtu/hr, Pt shall not exceed 0.6.

If $Q_T \geq 10$ MMBtu/hr, then:

$$Pt = 1.09 / Q_T^{0.26}$$

**Appendix A.1: Emission Calculations
326 IAC 6-3 Applicability**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street,
Logansport, IN 46947

Part 70 Operating Permit Renewal No.: T017-35999-00028

Significant Source Modification No.: 017-37058-00028

Reviewer: Hannah L. Desrosiers

Woodworking Lines

Operation	Process Weight Rate (tph)	Process Weight Rate (lb/hr)	Calculated E (lb/hr)	PTE PM after Integral Control* (lbs/hr)	Particulate Limitation E ** (lb/hr)
MILL	8.4	16,800	17.06	0.15	exempt
IDI	46.4	92,800	43.88	0.81	43.88
RETAIL	8.4	16,800	17.06	0.15	exempt

Wood Grinding

Operation	Process Weight Rate (tph)	Process Weight Rate (lb/hr)	Calculated E (lb/hr)	Uncontrolled Particulate Emissions (lbs/hr)	Particulate Limitation E ** (lb/hr)
CHHOG	8.4	16,800	17.06	2.94	17.06
IDIHOG1	46.4	92,800	43.88	16.24	43.88
IDIHOG2	92.8	185,600	50.53	32.48	50.53

Waste Wood Conveying and Handling

Operation	Process Weight Rate (tph)	Process Weight Rate (lb/hr)	Calculated E (lb/hr)	Uncontrolled Particulate Emissions (lbs/hr)	Particulate Limitation E ** (lb/hr)
CHWWBCS	8.4	16,800	17.06	0.03	exempt
IDIWWBCS	92.8	185,600	50.53	0.28	exempt

Ground Wood Conveying and Storage

Operation	Process Weight Rate (tph)	Process Weight Rate (lb/hr)	Calculated E (lb/hr)	Uncontrolled Particulate Emissions (lbs/hr)	Particulate Limitation E ** (lb/hr)
CHGWPCS*	8.4	16,800	17.06	2.52	17.06
IDIGWPCS1*	46.4	92,800	43.88	13.92	43.88
IDIGWPCS2*	92.8	185,600	50.53	27.84	50.53
CHGWACS	1.78	3,550	6.02	1.78	6.02
IDIGWACS	1.26	2,513	4.78	1.26	4.78

Notes

* PTE after consideration of integral cyclone control

** Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pounds per hour are specifically exempted from the requirements of 326 IAC 6-3-2.

Methodology

For process weight rates up to 60,000 lb/hr (30 tph):

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

For process weight rates above 60,000 lb/hr (30 tph):

$$E = 55.0 \times P^{0.11} - 40$$

Where:

E = Rate of emission in pounds per hour (lb/hr)

P = Process weight rate in tons per hour (tph)

Appendix A.2: Emissions Calculations
PTE of the Modification
326 IAC 2-7-10.5 Significant Source Modification Determination

Company Name: Cole Hardwood, Inc
Source Address: 1611 W. Market Street, Logansport, IN
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Process	Unlimited Potential to Emit After Integral Controls (tons/year)								
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	"Worst" Single HAP
Wood Grinding (IDIHOG2)	142.26	81.29	81.29	--	--	--	--	--	--
Wood Waste Conveying and Handling (belt)	1.22	0.45	0.45	--	--	--	--	--	--
Ground Wood Conveying and Handling (pneumatic) *	121.94	102.43	131.69	--	--	--	--	--	--
Total Ducted/ductable Emissions	265.42	184.17	213.43	0	0	0	0	0	0
Ground Wood Handling (fugitive)	1.80	0.85	0.13	--	--	--	--	--	--
Totals Unlimited/Uncontrolled PTE	267.22	185.02	213.56	0	0	0	0	0	0

Total emissions based on rated capacity at 8,760 hours/year.

* The pneumatic ground wood conveying systems potential emissions considered after integral controls for the purpose of determining the permitting level for this source. See the "Integral Part of the Process" Determination section of the TSD for more detail.

**Appendix A.2: Emissions Calculations
Unlimited Potential to Emit (PTE) PM, PM10 and PM2.5
Non-Fugitive (ductable) Emissions from the
Wood Grinding and Ground Wood Transfer**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Wood Grinding

Unit ID	Process	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (lbs/hr)	PTE of PM (tons/yr)	PM10/PM2.5 Emission Factor (lbs/ton)*	PTE of PM10/PM2.5 (lbs/hr)	PTE of PM10/PM2.5 (tons/yr)
IDIHOG2 ^(a)	IDI Wood Hog Grinder #2	92.8	0.35	32.48	142.26	0.20	18.56	81.29
Totals				32.48	142.26		18.56	81.29

Ground Wood Conveying and Handling

Unit ID	Process	Conveyor Type	Maximum Capacity (ton/hour)	PM Emission Factor (lbs/ton)	PTE of PM (lbs/hr)	PTE of PM (tons/yr)	PM10/PM2.5 Emission Factor (lbs/ton)	PTE of PM10/PM2.5 (lbs/hr)	PTE of PM10/PM2.5 (tons/yr)
IDIWWCS ^(b)	Conveying of wood waste to grinding machine IDIHOG2	Belt	92.8	0.0030	0.28	1.22	0.00110	0.10	0.45
IDIGWPCS2 ^{(c), (d)}	Pneumatic conveying of sawdust from IDIHOG2 to storage silo IDI-S1	Pneumatic	92.8	1.00	92.80	406.46	0.36	33.41	146.33
Totals					92.80	406.46		33.41	146.33

Unit ID	Pollutant	Control Efficiency ^(e) (%)	PTE after Integral Control (tons/yr)
IDIGWPCS2	PM	70%	121.94
	PM10	30%	102.43
	PM2.5	10%	131.69

Notes

The grinders produce ground wood of a size and consistency of sawdust.

Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". In the absence of valid PM2.5 emission factors, it is assumed that PM 2.5 emissions are equal to PM10 emissions.

(a) Emission Factors are from FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Pollutants, (August 1995), SCC 3-07-008-03 (log sawing at a sawmill operation).

(b) Emission Factors are from AP 42-11.19.2 Crushed Stone Processing and Pulverized Mineral Processing, Table 11.19.2-2 Emission Factors for Crushed Stone (English Units), Emission Factors for Crushed Stone Processing Operations (lb/ton), August 2004, SCC 3-05-020-06, (uncontrolled) Conveyor Transfer Point.

(c) Emission Factors are from Fire Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), SCC 3-07-008-03 (sawdust pile handling at a sawmill operation)

(d) The pneumatic conveying systems are each equipped with an integral cyclone collector/airlock unit.

(e) Control Efficiency from EPA CICA Air Pollution Control Technology Fact Sheet: Cyclones (EPA-452/F-03-005)

Methodology

PTE of PM/PM10/PM2.5 (lbs/hour) = Emission Factor (lb/ton) x Maximum Capacity (ton/hour)

PTE of PM/PM10/PM2.5 (tons/year) = PTE of PM/PM10/PM2.5 (lbs/hour) x 8760 (hours/year) x (1 ton/2000 pounds)

**Appendix A.2: Emissions Calculations
Fugitive Emissions from Material Handling**

Company Name: Cole Hardwood, Inc
Source Address: 1611 West Market Street, Logansport, IN 46947
Part 70 Operating Permit Renewal No.: T017-35999-00028
Significant Source Modification No.: 017-37058-00028
Reviewer: Hannah L. Desrosiers

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032) \cdot [(U/5)^{1.3} / (M/2)^{1.4}]$$

where: E_f = Emission Factor (lb/ton)

k (PM) =	0.74	= particle size modifier (0.74 assumed for aerodynamic diameter $\leq 100\mu\text{m}$)
k (PM10) =	0.35	= particle size modifier (0.35 assumed for aerodynamic diameter $\leq 10\mu\text{m}$)
k (PM2.5) =	0.053	= particle size multiplier (0.053 assumed for aerodynamic diameter $\leq 2.5\mu\text{m}$)
U =	9.1	= annual mean wind speed (source NOAA, 2015*)
M =	6.0	= material % moisture content of kiln dried hardwood sawdust (Source: Perdue University**)
E_f (PM) =	1.11E-03	lb PM/ton of material handled
E_f (PM10) =	5.24E-04	lb PM10/ton of material handled
E_f (PM2.5) =	7.94E-05	lb PM2.5/ton of material handled

IDIHOG2 Ground Wood Conveying and Handling - fugitives

Maximum Material Handling Throughput = 92.8 tons/hr

Type of activity	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/yr)
Loading sawdust onto truck for delivery to shed	0.45	0.21	0.03
Truck unloading of materials at shed	0.45	0.21	0.03
Front-end loader dumping of materials into shed	0.45	0.21	0.03
Loading sawdust from shed onto truck for delivery to boilers	0.45	0.21	0.03
Truck unloading of materials at boilers	0.45	0.21	0.03
Front-end loader dumping of materials into boiler feeder bins	0.45	0.21	0.03
Loading sawdust onto truck for delivery to sawdust storage pile	0.45	0.21	0.03
Truck unloading of sawdust onto sawdust storage pile	0.45	0.21	0.03
Loading sawdust from sawdust storage pile onto truck for delivery to boilers	0.45	0.21	0.03
Truck unloading of materials at boilers	0.45	0.21	0.03
Front-end loader dumping of materials into boiler feeder bins	0.45	0.21	0.03
Total (tons/yr)	1.80	0.85	0.13

Methodology

Potential to emit (tons/yr) = [(Maximum Material Handling Throughput (tons/hr)) * (Emission Factor (lb/ton)) * (1 ton/2000lbs) * (8760 hrs/1yr)]

*Annual mean wind speed from "Comparative Climactic Data", National Climactic Data Center, NOAA, 2015 (Southbend, IN)

<http://www1.ncdc.noaa.gov/pub/data/ccd-data/CCD-2015.pdf>

** Controlling Moisture Content in Stored Lumber, Purdue University Cooperative Extension Service, West Lafayette, IN 47907, FNR-403-W (https://www.extension.purdue.edu/extmedia/FNR/FNR_403_W.pdf)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10um)
 PTE = Potential to Emit

The particle size multiplier in the equation, k, varies with aerodynamic particle size range, as follows:

Aerodynamic Particle Size Multiplier (k) For Equation 1				
< 30 um	< 15 um	< 10 um	< 5 um	< 2.5 um
0.74	0.48	0.35	0.2	0.053 ^a

^a Multiplier for < 2.5 um taken from Reference 14.



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

Notice of Public Comment

August 11, 2016
Cole Hardwood, Inc.
017-37058-00028 & 017-35999-00028

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



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 11, 2016

Mr. Patrick Rentschler
Cole Hardwood, Inc.
PO Box 568
Logansport, IN 46947

Re: Public Notice
Cole Hardwood, Inc.
Permit Level: Significant Source Modification &
Part 70 Operating Permit Renewal
Permit Number: 017-37058-00028 &
017-35999-00028

Dear Mr. Rentschler:

Enclosed is a copy of your draft Significant Source Modification, Part 70 Operating Permit Renewal, 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 Pharos Tribune in Logansport, Indiana publish the abbreviated version of the public notice no later than August 15, 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 Logansport-Cass County Public Library, 616 East Broadway in Logansport, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Hannah Desrosiers, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-9327 or dial (317) 233-9327.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 11, 2016

To: Logansport-Cass County Public Library

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

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

Applicant Name: Cole Hardwood, Inc.
Permit Number: 017-37058-00028 & 017-35999-00028

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 2/16/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 11, 2016

Pharos Tribune
517 East Broadway
PO Box 210
Logansport, IN 46947

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Cole Hardwood, Inc., Cass County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 15, 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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Source Modification & Part 70 Operating Permit Renewal
Permit Number: 017-37058-00028 & 017-35999-00028

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 8/11/2016 Cole Hardwood, Inc 017-37058/35999-00028 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		Patrick Rentschler Cole Hardwood, Inc PO Box 568 Logansport IN 46947 (Source CAATS)										
2		John Land CFO Cole Hardwood, Inc PO Box 568 Logansport IN 46947 (RO CAATS)										
3		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)										
4		Cass County Board of Commissioner 200 Court Park Logansport IN 46947 (Local Official)										
5		Cass County Health Department 512 High Street Logansport IN 46947-2766 (Health Department)										
6		Logansport Cass Co Public Library 616 E Broadway Logansport IN 46947-3187 (Library)										
7		Logansport City Council and Mayors Office 601 Broadway Logansport IN 46947 (Local Official)										
8		Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 (Affected Party)										
9		Kim Cottrell Trinity Consultants 7330 Woodland Drive, Suite 225 Indianapolis IN 46278 (Consultant)										
10												
11												
12												
13												
14												
15												

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9			