

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Frank Miller Lumber Co., Inc.
1690 Frank Miller Road
Union City, Indiana 47390**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed 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 2-8 and 326 IAC 2-1-3.2, 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.

Operation Permit No.: F 135-7345-00029	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	5
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	5
A.3	Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(l)]	5
A.4	FESOP Permit Applicability [326 IAC 2-8-2]	5
SECTION B	GENERAL CONDITIONS	6
B.1	General Requirements [IC 13-15] [IC 13-17]	6
B.2	Definitions [326 IAC 2-8-1]	6
B.3	Permit Term [326 IAC 2-8-4(2)]	6
B.4	Enforceability [326 IAC 2-8-6]	6
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	6
B.6	Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]	6
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	6
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	6
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	7
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	7
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	7
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	7
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]	8
B.14	Emergency Provisions [326 IAC 2-8-12]	8
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	10
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	11
B.17	Permit Renewal [326 IAC 2-8-3(h)]	11
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	12
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	12
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	13
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]	13
B.22	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]	13
B.23	Operational Flexibility [326 IAC 2-8-15]	13
B.24	Construction Permit Requirement [326 IAC 2]	14
B.25	Inspection and Entry [326 IAC 2-8-5(a)(2)]	15
B.26	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]	15
B.27	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	16
B.28	Enhanced New Source Review [326 IAC 2]	16
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	17
C.2	Opacity [326 IAC 5-1]	17
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	17
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	17
C.5	Fugitive Dust Emissions [326 IAC 6-4]	18
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	18
C.7	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	18
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-2.1]	18

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)] 18
C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)] 19
C.11 Monitoring Methods [326 IAC 3] 19
C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140] 19

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] 20
C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215] 21
C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)] .. 21
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test 22

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

C.17 Monitoring Data Availability 22
C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] 23
C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] 24

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1 24

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions 25

Effective Date of the Permit 25

First Time Operation Permit 25

SECTION D.1 FACILITY OPERATION CONDITIONS

Two (2) Wood Waste-Fired Boilers, Lambion and Hurst 27

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

D.1.1 Particulate Limitations for Sources of Indirect Heating [326 IAC 6-2-4] 26
D.1.2 FESOP Limits [326 IAC 2-8-4] 26
D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] 26

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)] 26
D.1.5 Particulate Matter (PM) 27

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

D.1.6 Visible Emissions Notations 27

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

D.1.7 Record Keeping Requirements 27
D.1.8 Reporting Requirements 28

SECTION D.2 FACILITY OPERATION CONDITIONS

Woodworking operations 29

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2] 29

D.2.2 FESOP Limits [326 IAC 2-8-4] 29

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] 29

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(1)] 29

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

D.2.5 Visible Emissions Notations 29

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

D.2.6 Record Keeping Requirements 30

D.2.7 Reporting Requirements 30

Certification Form 31

Deviation Occurrence Report

For Control Equipment Monitoring Only 32

Deviation Occurrence Report 33

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

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

The Permittee owns and operates a lumber mill.

Responsible Official: Robert W. Mayer
Source Address: 1690 Frank Miller Road, Union City, Indiana 47390
Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390
SIC Code: 2421
County Location: Randolph
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;

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

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

- (a) One (1) wood waste-fired boiler, known as Lambion, exhausting at one (1) stack, identified as Stack 1, using a multiple cyclone fly ash arrester for particulate matter control, rated at 5.02 million British thermal units per hour.
- (b) One (1) wood waste-fired boiler, known as Hurst, exhausting at one (1) stack, identified as Stack 2, using a multiple cyclone fly ash arrester for particulate matter control, rated at 14.35 million British thermal units per hour.
- (c) One (1) woodworking area equipped with nine (9) generic woodworking machines using water mist dust controls, capacity: 3,000 board feet of wood per hour, total.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (d) Other emergency equipment as follows: Stationary fire pumps.

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

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

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

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

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

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

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

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that

IDEM, OAM 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.

- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
 - (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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission

limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, OAM 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) Delivered by any method and received and stamped by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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 in writing by IDEM, OAM any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM 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.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. When taking readings or photographs to assure compliance, IDEM will work with the Company to protect confidential business operations. [326 IAC 2-8-5(a)(4)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2(Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) 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.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM, OAM.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
- (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.13 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

- (c) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM shall supply such a plan.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM 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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 40 CFR 68 is an applicable requirement, and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed

in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM reserve the right to utilize enforcement activities to resolve the non-compliant stack test.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.17 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information 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 kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "trouble-shooting" guidance.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
- (c) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

- C.21 The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- C.22 This permit 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.

Effective Date of the Permit

- C.23 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- C.24 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- C.25 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

- C.26 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
- (a) The attached affidavit of construction shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) One (1) wood waste-fired boiler, known as Lambion, exhausting at one (1) stack, identified as Stack 1, using a multiple cyclone fly ash arrester for particulate matter control, rated at 5.02 million British thermal units per hour.
- (b) One (1) wood waste-fired boiler, known as Hurst, exhausting at one (1) stack, identified as Stack 2, using a multiple cyclone fly ash arrester for particulate matter control, rated at 14.35 million British thermal units per hour.

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

~~D.1.1 Particulate Limitations for Sources of Indirect Heating [326 IAC 6-2-4]~~

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), the PM emissions from the wood waste fired:

- (a) Lambion boiler shall be limited to 0.60 pounds of PM per million British thermal units of heat input, and
- (b) Hurst boiler shall be limited to 0.50 pounds of PM per million British thermal units of heat input.

These emission limits were calculated with the following equation:

$$Pt = 1.09/Q^{0.26}$$

Where: Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input = 5.02 and 19.37 MMBtu/hr, respectively, for the Lambion and Hurst boilers.

~~D.1.2 FESOP Limits [326 IAC 2-8-4]~~

Pursuant to 326 IAC 2-8-4, the total wood-waste throughput to the two (2) wood-fired boilers shall be limited to 1,414 tons per month with a wood heating value of 5,000 British thermal units per pound which is equivalent to a total PM₁₀ emission limit of 2.05 tons per month (24.6 tons per year). This emission limit represents the potential controlled PM₁₀ emissions.

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

~~D.1.4 Testing Requirements [326 IAC 2-8-5(1)]~~

- (a) Testing of the 5.02 million British thermal units per hour Lambion wood-waste boiler is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).
- (b) During the period between 30 and 36 months after issuance of this permit, the Permittee

shall perform PM and PM₁₀ testing of the 14.35 million British thermal units per hour Hurst wood-waste boiler utilizing Methods 5 or 7 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM₁₀, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀.

D.1.5 Particulate Matter (PM)

The multiple cyclone fly ash arrestors for PM control shall be in operation at all times when the Lambion and Hurst boilers are in operation.

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

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the PM₁₀ emission limits established in Condition D.1.2.
 - (1) The amount of fuel used. Records shall include purchase orders and invoices necessary to verify the amount used.
 - (2) A log of the dates of use.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of daily emission observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

Any deviations shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted by July 1 of each year.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (c) One (1) woodworking area equipped with nine (9) generic woodworking machines using water mist dust controls, capacity: 3,000 board feet of wood per hour, total.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 21.7 pounds per hour (95.0 tons per year) when operating at a process weight rate of 12.0 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

Where: E = rate of emission in pounds per hour
P = process weight rate in tons per hour

D.2.2 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 the total PM₁₀ emissions from the woodworking facilities shall be limited to 6.12 tons per month (73.4 tons per year).

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the water mist dust controls exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Frank Miller Lumber Co., Inc.
Union City, Indiana
Permit Reviewer:MES

Page 30 of 33
OP No. F 135-7345-00029

- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the lumber mill exhaust.
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Total wood throughput.
 - (2) Documentation of all corrective actions implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

Any deviations shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted by July 1 of each year.

State Form 47738 (5-96)

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

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

Source Name: Frank Miller Lumber Co., Inc.
Source Address: 1690 Frank Miller Road, Union City, Indiana 47390
Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390
FESOP No.: F 135 - 7345 - 00029

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:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 DEVIATION OCCURRENCE REPORT
 (For Control Equipment Monitoring Only)**

Source Name: Frank Miller Lumber Co., Inc.
 Source Address: 1690 Frank Miller Road, Union City, Indiana 47390
 Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390
 FESOP No.: F 135 - 7345 - 00029

If a deviation has occurred, a separate copy of this report must be submitted for each monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.	
Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
<input checked="" type="checkbox"/> Continuously	<input type="checkbox"/> Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
<input checked="" type="checkbox"/> Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ($\frac{[2]}{[1]} \times 100$)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

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

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

Source Name: Frank Miller Lumber Co., Inc.
Source Address: 1690 Frank Miller Road, Union City, Indiana 47390
Mailing Address: 1690 Frank Miller Road, Union City, Indiana 47390
FESOP No.: F 135 - 7345 - 00029

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit.
Attach a signed certification to complete this report.

Stack/Vent ID:

Equipment/Operation:

Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit:
(ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)

Determination Period for this Parameter:
(ex: 365-day rolling sum, fixed monthly rate)

9 Permit Has No Rate Limitations for this Parameter.

Content Restriction for this Parameter:
(ex: maximum of 40% VOC in inks, 0.5% sulfur content)

Demonstration Method for this Parameter:
(ex: MSDS, Supplier, material sampling & analysis)

9 Permit Has No Content Limitations for this Parameter.

Comments:

Indiana Department of Environmental Management Office of Air Management

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

Source Background And Description

Source Name: Frank Miller Lumber Co., Inc.
Source Location: 1690 Frank Miller Road, Union City, Indiana 47390
County: Randolph
SIC Code: 2421
Operation Permit No.: F 135 - 7345 - 00029
Permit Reviewer: Mark L. Kramer

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Frank Miller Lumber Co., Inc. relating to the operation of a lumber mill.

Permitted Emission Units and Pollution Control Equipment

The source does not consist of any permitted emission units or pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (a) One (1) wood waste-fired boiler, known as Lambion, exhausting at one (1) stack, identified as Stack 1, using a flue gas dust extractor with a fly ash conveyor for particulate matter control, rated at 5.02 million British thermal units per hour.
- (b) One (1) wood waste-fired boiler, known as Hurst, exhausting at one (1) stack, identified as Stack 2, using a multiple cyclone fly ash arrestor for particulate matter control, rated at 14.35 million British thermal units per hour.
- (c) One (1) woodworking area equipped with nine (9) generic woodworking machines using water mist dust controls, capacity: 3,000 board feet of wood per hour, total.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The above unpermitted facilities will be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling

tower.

- (d) Other emergency equipment as follows: Stationary fire pumps.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
- (1) One (1) wood waste-fired boiler, known as Lambion, exhausting at one (1) stack, identified as Stack 1, using a flue gas dust extractor with a fly ash conveyor for particulate matter control, rated at 5.02 million British thermal units per hour.
 - (2) One (1) wood waste-fired boiler, known as Hurst, exhausting at one (1) stack, identified as Stack 2, using a multiple cyclone fly ash arrestor for particulate matter control, rated at 14.35 million British thermal units per hour.
 - (3) One (1) woodworking area equipped with nine (9) generic woodworking machines using water mist dust controls, capacity: 3,000 board feet of wood per hour, total.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on December 4, 1996. Additional information was received on December 16, 1997, July 28, 1997, and July 29, 1997.

Emissions Calculations

See pages 1 through 6 of 6 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	148
PM ₁₀	140
SO ₂	0.890
VOC	4.68
CO	55.9
NO _x	12.2

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

See attached spreadsheets for detailed calculations on pages 1 through 6 of 6 of Appendix A.

HAP	Potential Emissions (tons/year)
Lead	0.003
TOTAL	0.003

See attached spreadsheets for detailed calculations on pages 1 through 2 of 6 of Appendix A.

- (a) The potential emissions (as defined in the Indiana Rule) of particulate matter (PM₁₀) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD.

Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit PM₁₀ of 99 tons per year, consisting of:
 - (i) 8.17 tons per month for the significant activities; and
 - (ii) 0.08 tons per month for the insignificant activities.
- (b) The table below summarizes the total limited potential to emit of the significant and insignifi-

cant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Combustion	39.6	24.6	0.890	4.68	55.9	12.2	0.003
Woodworking	6.5 (95.0)	6.5 (73.4)	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	1.0	1.0	1.0	1.0	1.0	1.0	0.00
Total Emissions	47.1 (136)	32.1 (99.0)	0.890	4.68	55.87	12.2	0.003

The values in parentheses represent the allowable emissions pursuant to 326 IAC 6-3-2 for PM and the overall FESOP limit for PM₁₀.

Attached Tables 1 and 2 summarize the permit conditions and requirements.

County Attainment Status

The source is located in Randolph County.

Pollutant	Status
TSP	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Randolph County has been designated as attainment for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

Frank Miller Lumber Co., Inc.
Union City, Indiana
Permit Reviewer: MES

Page 5 of 10
F 135-7345-00029

State Rule Applicability - Entire Source

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀ shall be limited to 8.25 tons per month (99.0 tons per year). Therefore, the requirements of 326 IAC 2-7, do not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), the wood waste fired boilers are subject to the following limit:

$$Pt = 1.09/Q^{0.26} = 0.72 \text{ lbs/MMBtu}$$

This value has been truncated to 0.60 lbs/MMBtu pursuant to the rule for the 5.02 MMBtu/hr boiler and is equal to 0.50 lbs/MMBtu for the 14.35 MMBtu/hr boiler.

Where: Pt = Pounds of particulate matter (PM) emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour at time of construction which was 5.02 MMBtu/hr for the 1st boiler and 19.37 MMBtu/hr for the 2nd boiler.

- (a) For the 5.02 million British thermal units per hour wood waste boiler, constructed in 1983, emissions from PM are as follows. The corrected controlled emission factor is 4.67 pounds of PM per ton of wood burned. The 5.02 million British thermal units per hour Lambion boiler has a potential throughput of 0.502 tons per hour at a wood waste heating value of 5,000 British thermal units per pound. Thus, 4.67 pounds of PM per ton of wood burned x 0.502 tons per hour burned equals 2.34 pounds of PM per hour. For a heat input capacity of 5.02 million British thermal units per hour, this equates to 0.467 pounds of PM per million British thermal units. Thus, this boiler complies with the limit of 0.60 pounds of PM per million British thermal units.
- (b) For the 14.35 million British thermal units per hour wood waste boiler, constructed in 1987, emissions from PM are as follows. The corrected controlled emission factor is 4.67 pounds of PM per ton of wood burned. The 14.35 million British thermal units per hour Hurst boiler has a potential throughput of 1.44 tons per hour at a wood waste heating value of 5,000

British thermal units per pound. Thus, 4.67 pounds of PM per ton of wood burned x 1.44 tons per hour burned equals 6.70 pounds of PM per hour. For a heat input capacity of 14.35 million British thermal units per hour, this equates to 0.467 pounds of PM per million British thermal units. Thus, this boiler complies with the limit of 0.50 pounds of PM per million British thermal units.

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule the particulate matter (PM) emissions from the woodworking area shall be limited to 21.7 pounds per hour. This was determined from the following equation for a process rate of 12.0 tons per hour.

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:

$$E = 4.10 P^{0.67} = 21.7 \text{ lbs/hr}$$

Where: E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Since the total controlled PM emissions from the woodworking operations are 1.48 pounds per hour (6.50 tons per year), this process complies with the rule.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

- (a) The combustion facilities have applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emissions notations of the Lambion boiler stack (Stack 1) exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (2) Daily visible emissions notations of the Hurst boiler stack (Stack 2) exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (3) The Permittee shall monitor and record the fuel usage per boiler, at least once daily when the combustion facilities are in operation.
- (4) The dust extractor and cyclone ash arrestor shall be in operation with the Lambion and Hurst boilers, respectively, at all times that the boilers are in operation.

These monitoring conditions are necessary because the PM_{10} emissions must be limited below Title V levels. These facilities must demonstrate compliance with the FESOP limits established in 326 IAC 2-8-4 and the limits of 326 IAC 6-2-4.

- (b) The woodworking facilities have applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emissions notations of the woodworking facilities water mist dust control exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (2) The Permittee shall monitor and record the total wood throughput, at least once

- daily when the woodworking facilities are in operation.
- (3) The water mist dust controls shall be operated with the woodworking facilities at all times.

These monitoring conditions are necessary because the PM_{10} emissions must be limited below Title V levels. These facilities must demonstrate compliance with the FESOP limits established in 326 IAC 2-8-4 and with 326 IAC 6-3-2 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations on pages 1 and 2 of 6 of Appendix A.

Conclusion

The operation of this lumber mill will be subject to the conditions of the attached proposed **FESOP No. F 135-7345-00029**.

Table 1

Stack/Vent ID: Stack 1 and Stack 2			
Stack/Vent Dimensions: Stack 1 Ht: 45.0 ft. Dia. 2.0 ft. Temp: 550EF Flow: 3,750 cfm			
Stack/Vent Dimensions: Stack 1 Ht: 40.0 ft. Dia. 2.0 ft. Temp: 600EF Flow: 6,670 cfm			
Emission Unit: Two (2) Wood Waste Fired Boilers (Lambion and Hurst)			
Date of Construction: 1983 and 1987			
Alternative Scenario: None			
Pollution Control Equipment: Flue gas dust extractor and multiple cyclone fly ash arrestor			
General Description of Requirement:	Limit PM ₁₀ to below Title V applicability levels and PM to 326 IAC 6-2-4 criteria		
Numerical Emission Limit:	PM ₁₀ : 1,414 tons of wood waste throughput per month at 5,000 Btu/lb	Equivalent to PM ₁₀ : 2.05 tons per month, total PM: 0.6 & 0.5 lbs/MMBtu,	
Regulation/Citation:			326 IAC 2-8-4 326 IAC 6-2-4
Compliance Demonstration:			
PERFORMANCE TESTING N/A			
Parameter/Pollutant to be Tested:			
Testing Method/Analysis:			
Testing Frequency/Schedule:			
Submittal of Test Results:			
COMPLIANCE MONITORING			
Monitoring Description:			Opacity observations
Monitoring Method:			Visible
Monitoring Regulation/Citation:			326 IAC 12
Monitoring Frequency:			Daily
RECORD KEEPING			
Parameter/Pollutant to be Recorded:			Fuel consumption / PM and PM ₁₀
Recording Frequency:			Daily
Submittal Schedule of Reports:			Upon Request
REPORTING REQUIREMENTS			
Information in Report:			Summary of deviations
Reporting Frequency/Submittal:			As necessary within 10 days of discovery of deviation

Frank Miller Lumber Co., Inc.
Union City, Indiana
Permit Reviewer: MES

Page 11 of 10
F 135-7345-00029

Additional Comments:			
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Table 2

Stack/Vent ID: N/A			
Emission Unit: Woodworking Areas and Sawdust Handling Operation			
Date of Construction: 1983			
Alternative Scenario: None			
Pollution Control Equipment: Water mist dust control			
General Description of Requirement:	Limit PM ₁₀ to below Title V applicability levels and PM to 326 IAC 6-3-2 criteria		
Numerical Emission Limit:	PM ₁₀ 6.12 tons per month and PM to 21.7 pounds per hour		
Regulation/Citation:	PM ₁₀ 326 IAC 2-8-4 and PM 326 IAC 6-3-2		
Compliance Demonstration:			
PERFORMANCE TESTING N/A			
Parameter/Pollutant to be Tested:			
Testing Method/Analysis:			
Testing Frequency/Schedule:			
Submittal of Test Results:			
COMPLIANCE MONITORING			
Monitoring Description:	Opacity observations		
Monitoring Method:	Visible		
Monitoring Regulation/Citation:	326 IAC 12		
Monitoring Frequency:	Daily		
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Daily wood throughput		
Recording Frequency:	As necessary		
Submittal Schedule of Reports:	Upon request		
REPORTING REQUIREMENTS			
Information in Report:	Summary of deviations		
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation		
Additional Comments:			

Company Name: Frank Miller Lumber Co., Inc.
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390
FESOP: F 135-7345
Plt ID: 135-00029
Reviewer: Mark L. Kramer
Date: December 4, 1996

* * emissions before controls * *

Storage		** see page 2 **				0.0004 tons/yr	AP-42 Ch.11.2.3
Transporting		** see page 3 **				0.00 tons/yr	AP-42 Ch.11.2.1
Loading & Unloading	0 ton/hr x	0.0016 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.00 tons/yr		AP-42 Ch.11.2.3
Crushing (primary)	0 ton/hr x	0.00504 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.00 tons/yr		AP-42 Ch.11.19.2
Crushing (secondary)	0 ton/hr x	0.00504 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.00 tons/yr		AP-42 Ch.11.19.2
Crushing (tertiary)	0 ton/hr x	0.00504 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.00 tons/yr		AP-42 Ch.11.19.2
Screening	0 ton/hr x	0.0315 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.00 tons/yr		AP-42 Ch.11.19.2
Conveyor Transfer	0 ton/hr x	0.00294 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.00 tons/yr		AP-42 Ch.11.19.2
Total emissions before controls:						0.0004 tons/yr	

* * emissions after controls * *

Storage	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Transporting	0.00 tons/yr x	50% emitted after controls =	0.00 tons/yr
Loading & Unloading	0.00 tons/yr x	100% emitted after controls =	0.00 tons/yr
Crushing (primary)	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Crushing (secondary)	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Crushing (tertiary)	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Screening	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Conveying	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Total emissions after controls:			0.00 tons/yr

* * fugitive vs. nonfugitive * *

Storage	0.0004 tons/yr x	10% emitted after controls =	0.00004 tons/yr
Transporting	0.00 tons/yr x	50% emitted after controls =	0.00 tons/yr
Loading / Unloading	0.00 tons/yr x	100% emitted after controls =	0.00 tons/yr
Total fugitive emissions:			0.00004 tons/yr
Crushing (primary)	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Crushing (secondary)	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Crushing (tertiary)	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Screening	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Conveying:	0.00 tons/yr x	10% emitted after controls =	0.00 tons/yr
Total nonfugitive emissions:			0.00 tons/yr

* * storage * *

Storage emissions, which result from wind erosion, are determined by the following calculations:

$$E_f = 1.7 \cdot (s/1.5) \cdot (365-p)/235 \cdot (f/15)$$

$$= 1.85 \text{ lb/acre/day}$$

where s = 1.6 % silt content of material

p = 125 days of rain greater than or equal to 0.01 inches

f = 15 % of wind greater than or equal to 12 mph

$$E_p (\text{storage}) = E_f \cdot sc \cdot (40 \text{ cuft/ton}) / (2000 \text{ lb/ton}) / (43560 \text{ sqft/acre}) / (25 \text{ ft}) \cdot (365 \text{ day/yr})$$

$$= 0.0004 \text{ tons/yr}$$

where sc = 0.035 ,000 tons storage capacity

0
0

* * unpaved roads * *

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

$$\begin{aligned} & 0 \text{ trip/hr} \times \\ & 0 \text{ mile/trip} \times \\ & 2 \text{ (round trip) } \times \\ 8760 \text{ hr/yr} & = 0 \text{ miles per year} \end{aligned}$$

$$\begin{aligned} E_f &= k \cdot 5.9 \cdot (s/12) \cdot (S/30) \cdot (W/3)^{0.7} \cdot (w/4)^{0.5} \cdot ((365-p)/365) \\ &= 5.19 \text{ lb/mile} \end{aligned}$$

- where k = 0.8 (particle size multiplier)
- s = 4.8 % silt content of unpaved roads
- p = 125 days of rain greater than or equal to 0.01 inches
- S = 10 miles/hr vehicle speed
- W = 38 tons average vehicle weight
- w = 18 wheels

$$\frac{5.19 \text{ lb/mi} \times 0 \text{ mi/yr}}{2000 \text{ lb/ton}} = 0.00 \text{ tons/yr}$$

* * aggregate handling * *

The following calculations determine the amount of emissions created by truck loading and unloading of aggregate, based on 8760 hours of use and AP-42, Ch 11.2.3.

$$\begin{aligned} E_f &= k \cdot (0.0032) \cdot (U/5)^{1.3} / (M/2)^{1.4} \\ &= 0.0016 \text{ lb/ton} \end{aligned}$$

- where k = 0.74 (particle size multiplier)
- U = 10 mile/hr mean wind speed
- M = 5 % material moisture content

**Appendix A: Emission Calculations
Woodworking Machines**

Company Name: Frank Miller Lumber Co., Inc.
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390
FESOP: F 135-7345
Plt ID: 135-00029
Reviewer: Mark L. Kramer
Date: December 4, 1996

Unit I.D.	Pollutant	Uncontrolled PM10 (tons/yr)	Control Efficiency	Controlled PM10 (tons/yr)
L&B Headsaw	sawdust	5.0	90%	0.5
Salem Resaw	sawdust	5.0	90%	0.5
Salem Edger	sawdust	9.0	90%	0.9
Salem Trim Saw	sawdust	12.0	90%	1.2
Trim Saw	sawdust	3.0	90%	0.3
Trim Saw	sawdust	3.0	90%	0.3
S/L Rip Saw	sawdust	2.0	90%	0.2
Planer	sawdust	12.0	90%	1.2
Fulghum	sawdust	14.0	90%	1.4

Total Uncontrolled PM10 65.0 (tons/yr) **Total Controlled PM10** 6.5 (tons/yr)

Methodology

All data supplied from GSD-07

Water mist dust control efficiency = 90%

**Appendix A: Emission Calculations
Dutch Oven Boiler
Industrial Boiler**

Company Name: Frank Miller Lumber Co., Inc.
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390
FESOP: F 135-7345
Plt ID: 135-00029
Reviewer: Mark L. Kramer
Date: December 4, 1996

Heat Input Capacity (MMBtu/hr)	Heating Value of Wood (Btu/lb)	Potential Throughput (tons/yr)	Moisture (%)
14.35	5000	12571	50.0

Note that 4500 gives 13967 potential throughput

Uncontrolled Emissions	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	Lead
Uncontrolled Emission Factor in lb/ton (at 4500 Btu/lb)	8.8	7.9	0.075	1.5	0.18	6.6	0.00031
Uncontrolled Emission Factor in lb/ton (Corrected for wood Btu/lb)	9.78	8.78	0.083	1.67	0.200	7.3	0.000344
Uncontrolled Potential Emission in tons/yr	61.5	55.2	0.524	10.5	1.26	46.1	0.002

Controlled Emissions		
Emission Factor in lb/ton (at 4500 Btu/lb)	4.20	2.60
Emission Factor in lb/ton (Corrected for wood Btu/lb)	4.67	2.89
Potential Emission in tons/yr	29.3	18.2

Methodology

AP-42 Heating Value of Wood = 4500 Btu/lb

Potential Throughput (tons/yr) = [Heat Input Capacity (MMBtu/hr)] X [1 lb/4500 Btu] X [10⁶/MM] X [8760 hrs/yr] X [1 ton/2000 lbs]

Adjusting Throughput from 4500 Btu/lb: Throughput(@ Adj Btu/lb = [Throughput @ 4500 Btu/lb (tons/yr)] X [4500 Btu/lb] / [Adj Btu value (Btu/lb)]

Emission Factors from AP-42, Chap. 1.6, Tables 1.6-1, 1.6-2 and 1.6-3, SCC #1-01-009-03

Emission Factor Btu Adjustment: [EF@Btu (lb/ton)] = [EF @4500 Btu/lb (lb/ton)] X [Adjusted Btu/lb] / [4500 Btu/lb]

Emission (tons/yr) = [Throughput (tons/yr)] X [Emission Factor (lb/ton)] X [1 ton/2000 lbs]

The 14.35 MMBtu/hr wood/wood waste-fired boiler is equipped with a multiple fly ash arrestor.

Particulate Matter AP-42 % control = [1 - {(4.2 lb PM/ton) / (8.8 lb PM/ton)}] X [100] = 52.27 % for control with a mechanical collector

Particulate Matter (PM10) AP-42 % control = [1 - {(2.6 lb PM10/ton) / (7.9 lb PM10/ton)}] X [100] = 67.1% for control with a mechanical collector

AP-42 CO emission value for the Dutch oven boiler = 6.6 lb/ton.

Appendix A: Emission Calculations
Wood-Fired Stoker Boilers
Commercial Boiler
0.5 - 10 MMBtu/hr

Company Name: Frank Miller Lumber Co., Inc.
Address City IN Zip: 1690 Frank Miller Road, Union City, IN 47390
FESOP: F 135-7345
Pit ID: 135-00029
Reviewer: Mark L. Kramer
Date: December 4, 1996

Heat Input Capacity (MMBtu/hr)	Heating Value of Wood (Btu/lb)	Potential Throughput (tons/yr)	Moisture (%)
5.02	5000	4398	50.0

Note that 4500 gives 4886 potential throughput

Uncontrolled Emissions	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	Lead
Uncontrolled Emission Factor in lb/ton (at 4500 Btu/lb)	8.8	7.9	0.15	0.68	1.4	4.0	0.00031
Uncontrolled Emission Factor in lb/ton (Corrected for wood Btu/lb)	9.78	8.78	0.167	0.756	1.56	4.44	0.00034
Uncontrolled Potential Emission in tons/yr	21.5	19.3	0.366	1.66	3.42	9.77	0.0008

Controlled Emissions		
Emission Factor in lb/ton (at 4500 Btu/lb)	4.20	2.60
Emission Factor in lb/ton (Corrected for wood Btu/lb)	4.67	2.89
Potential Emission in tons/yr	10.3	6.35

Methodology

AP-42 Heating Value of Wood = 4500 Btu/lb

Potential Throughput (tons/yr) = [Heat Input Capacity (MMBtu/hr)] X [1 lb/4500 Btu] X [10⁶/MM] X [8760 hrs/yr] X [1 ton/2000 lbs]

Adjusting Throughput from 4500 Btu/lb: Throughput(@ Adj Btu/lb = [Throughput @ 4500 Btu/lb (tons/yr)] X [4500 Btu/lb] / [Adj Btu value (Btu/lb)]

Emission Factors from AP-42, Chap. 1.6, Tables 1.6-1, 1.6-2 and 1.6-3, and AIRS, SCC #1-03-009-03

Emission Factor Btu Adjustment: [EF@Btu (lb/ton)] = [EF @4500 Btu/lb (lb/ton)] X [Adjusted Btu/lb] / [4500 Btu/lb]

Emission (tons/yr) = [Throughput (tons/yr)] X [Emission Factor (lb/ton)] X [1 ton/2000 lbs]

The 5.02 MMBtu/hr wood/wood waste-fired boiler is equipped with flue gas dust extractor with a fly ash conveyor.

Particulate Matter (PM) AP-42 % control = [1 - {(4.2 lb PM/ton) / (8.8 lb PM/ton)}] X [100] = 52.27 % for control with a mechanical collector

Particulate Matter (PM10) AP-42 % control = [1 - {(2.6 lb PM10/ton) / (7.9 lb PM10/ton)}] X [100] = 67.1% for control with a mechanical collector

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name:	Frank Miller Lumber Co., Inc.
Source Location:	1690 Frank Miller Road, Union City, Indiana 47390
County:	Randolph
FESOP:	F 135-7345-00029
SIC Code:	2421
Permit Reviewer:	Mark L. Kramer

On December 1, 1997, the Office of Air Management (OAM) had a notice published in the News-Gazette, Winchester, Indiana, stating that Frank Miller Lumber Co., Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate the lumber mill source with control. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the FESOP:

1. The description of the particulate matter control device on the 5.02 million British thermal units per hour Lambion wood-waste boiler originally described as "using a flue gas dust extractor with fly ash conveyor" has been changed to "using a multiple cyclone fly ash arrestor" in Sections A.2 and D.1 and D.1.5 of the permit.
2. Stack performance testing of the particulate matter and PM₁₀ emissions from the 14.35 million British thermal units per hour Hurst wood-waste boiler has been added in Section D.1.4 of the permit to assure compliance with 326 IAC 6-2 rule. This rule requires that the boiler emissions do not exceed 0.5 pounds of particulate matter per million British thermal units. Section D.1.4 has been changed from:

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

"Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1)."

to:

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

- (a) Testing of the 5.02 million British thermal units per hour Lambion wood-waste boiler is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).
- (b) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM₁₀ testing of the 14.35 million British thermal units per hour Hurst wood-waste boiler utilizing Methods 5 or 7 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM₁₀, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀.

On January 8, 1998, Bob Mayer of Frank Miller Lumber Co. submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 1:

On page 15, paragraph B.25(e), the provision grants IDEM to "utilize any photographic, or (video) recording . . . for the purpose of assuring compliance with this permit or applicable requirements." As we have business confidential and proprietary manufacturing mechanisms, I wish to see this provision deleted.

Response 1:

Subsections (1) and (2) have been added to Section B.25(e) of the permit and are as follows:

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

Comment 2:

On page 26, paragraph D.1.4 and on page 28, paragraph D.2.4, references are made to 326 IAC 2-8-5(1). I wish to have these reference deleted.

Response 2:

326 IAC 2-8-5 states that each FESOP shall contain the following requirements: Compliance certification, testing, monitoring, reporting and record keeping requirements sufficient to assure compliance with the terms and conditions of the FESOP. Since Conditions D.1.4 and D.2.4 refer to testing requirements, the references have not been deleted from these Conditions.