NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)

for Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill in Owen County

MSOP Renewal No.: M119-43838-00020

The Indiana Department of Environmental Management (IDEM) has received an application from Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill located at 725 U.S. 231, Spencer, Indiana 47460 for a renewal of its MSOP issued on March 10, 2016. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

Owen County Public Library
10 South Montgomery Street
Spencer, IN 47460

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

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.
Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M119-43838-00020 in all correspondence.

Comments should be sent to:

Mehul Sura
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Mehul Sura or (317) 233-6868
Or dial directly: (317) 233-6868
Fax: (317) 232-6749 attn: Mehul Sura
E-mail: msura@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/2358.htm; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

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

[Signature]

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality
Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill
725 U.S. 231
Spencer, Indiana 47460

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M119-43838-00020
Master Agency Interest ID: 110,906

<table>
<thead>
<tr>
<th>Issued by:</th>
<th>Issuance Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Madhurima D. Moulik, Section Chief Permits Branch Office of Air Quality</td>
<td></td>
</tr>
</tbody>
</table>

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<tr>
<th>Exp. Date:</th>
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Attachment A: Fugitive Dust Control Plan
SECTION A  SOURCE SUMMARY

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

A.1  General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary stationary white oak stave mill operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>725 U.S. 231, Spencer, Indiana 47460</th>
</tr>
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<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>502-364-4563</td>
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<tr>
<td>SIC Code:</td>
<td>2429</td>
</tr>
<tr>
<td>County Location:</td>
<td>Owen</td>
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<td>Source Location Status:</td>
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<tr>
<td>Source Status:</td>
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<td>Minor Source, under PSD Rules</td>
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<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
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<tr>
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<td>Not 1 of 28 Source Categories</td>
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</table>

A.2  Emission Units and Pollution Control Equipment Summary

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

(a) One Stave mill, with a maximum throughput of 900 white oak logs per day, consisting of the following woodworking equipment:

(1) One (1) debarker for removing bark from fresh logs, identified as SP-E1, constructed in 2013, uncontrolled and exhausting outdoors.

(2) One (1) merchandiser saw for cutting logs to the proper length, identified as SP-E2, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(3) One (1) halving saw for cutting logs in half lengthwise, identified as SP-E3, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(4) One (1) quarter saw for cutting halved logs in half length-wise, identified as SP-E4, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(5) Two (2) resaws saws for cutting quartered logs into stave boards, identified as SP-E5a and SP-E5b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(6) One (1) rip saw and one (1) edge saw, arranged in series, for cutting the edges of the stave, identified as SP-E6a and SP-E6b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(7) One (1) rip saw and one (1) edge saw, arranged in series, for cutting the edges of the stave, identified as SP-E7a and SP-E7b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.
(8) Three (3) rework saws, consisting of one (1) stave saw, one (1) trim saw, and one (1) heading saw, for correcting flaws in staves, identified as SP-E8, SP-E9, and SP-E10, respectively, each constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(9) One (1) chipper, identified as SP-E11, constructed in 2016, with a maximum throughput of 225,000 board feet per day, uncontrolled, and exhausting outdoors.

(b) Sawdust handling operation, identified as DUST, with a maximum capacity of 6.07 tons per hour, constructed in 2013, using no control device, exhausting outdoors. The sawdust is collected throughout the mill by cyclone C1. Sawdust and chips from the chipper are conveyed via belt conveyor from the cyclone to an enclosed auger system (process identified as DUST-C) and free fall into two (2) loadout trailers (process identified as DUST-B).

(c) One (1) natural gas-fired hydronic boiler, identified as E-6, constructed in 2016, with a maximum capacity of 0.963 million British thermal units (MMBtu) per hour, uncontrolled, and exhausting to stack S-6.

(d) Conveyors consisting of the following:

(1) One (1) uncovered, outdoor chain conveyor for logs, constructed in 2013, identified as the merchandiser conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting outdoors.

(2) One (1) uncovered, indoor chain conveyor for conveying logs to the halving saw, constructed in 2013, identified as the halving log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(3) One (1) uncovered, indoor chain conveyor for conveying the halved logs to the quarter saw, constructed in 2013, identified as the quarter log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(4) One (1) uncovered, indoor chain conveyor for conveying quartered logs to the resaws, constructed in 2013, identified as the quartered log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(5) One (1) uncovered, indoor chain conveyor for conveying quarter logs to the north resaw, constructed in 2013, identified as the north resaw conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(6) One (1) uncovered, indoor chain conveyor for conveying quarter logs to the south resaw, constructed in 2013, identified as the south resaw conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(7) One (1) uncovered, indoor belt conveyor for conveying the staves to the rip and edge saws, constructed in 2013, identified as the north heart/sap edging conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.
(8) One (1) uncovered, indoor belt conveyor for conveying the staves to the rip and edge saws, constructed in 2013, identified as the south heart/sap edging conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(9) One (1) uncovered, indoor belt conveyor for conveying the edged staves to the stave stacking table, constructed in 2013, identified as the stave table conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(10) One (1) uncovered, indoor belt conveyor for conveying the edged staves to the head stacking table, constructed in 2013, identified as the head table conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(11) One (1) uncovered, indoor vibrating conveyor for conveying wood waste to the chipper, constructed in 2013, identified as the chipper conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(12) One (1) uncovered belt conveyor for conveying bark waste from the debarker to an enclosed auger system, with the bark free falling into one (1) loadout trailer, constructed in 2016, with a maximum throughput of 9.37 tons per hour, uncontrolled and exhausting outdoors.

(e) Unpaved roads.
SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

(a) This permit, M119-43838-00020, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

The Permittee shall implement the PMPs.

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

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M119-43838-00020 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.
C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

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

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

2. If there is a change in the following:

   (A) Asbestos removal or demolition start date;

   (B) Removal or demolition contractor; or

   (C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on
pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2][IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
**SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

(a) One Stave mill, with a maximum throughput of 900 white oak logs per day, consisting of the following woodworking equipment:

(1) One (1) debarker for removing bark from fresh logs, identified as SP-E1, constructed in 2013, uncontrolled and exhausting outdoors.

(2) One (1) merchandiser saw for cutting logs to the proper length, identified as SP-E2, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(3) One (1) halving saw for cutting logs in half lengthwise, identified as SP-E3, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(4) One (1) quarter saw for cutting halved logs in half length-wise, identified as SP-E4, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(5) Two (2) resaws saws for cutting quartered logs into stave boards, identified as SP-E5a and SP-E5b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(6) One (1) rip saw and one (1) edge saw, arranged in series, for cutting the edges of the stave, identified as SP-E6a and SP-E6b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(7) One (1) rip saw and one (1) edge saw, arranged in series, for cutting the edges of the stave, identified as SP-E7a and SP-E7b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(8) Three (3) rework saws, consisting of one (1) stave saw, one (1) trim saw, and one (1) heading saw, for correcting flaws in staves, identified as SP-E8, SP-E9, and SP-E10, respectively, each constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(9) One (1) chipper, identified as SP-E11, constructed in 2016, with a maximum throughput of 225,000 board feet per day, uncontrolled, and exhausting outdoors.

(b) Sawdust handling operation, identified as DUST, with a maximum capacity of 6.07 tons per hour, constructed in 2013, using no control device, exhausting outdoors. The sawdust is collected throughout the mill by cyclone C1. Sawdust and chips from the chipper are conveyed via belt conveyor from the cyclone to an enclosed auger system (process identified as DUST-C) and free fall into two (2) loadout trailers (process identified as DUST-B).

(d) Conveyors consisting of the following:

(1) One (1) uncovered, outdoor chain conveyor for logs, constructed in 2013, identified as the merchandiser conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting outdoors.
(2) One (1) uncovered, indoor chain conveyor for conveying logs to the halving saw, constructed in 2013, identified as the halving log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(3) One (1) uncovered, indoor chain conveyor for conveying the halved logs to the quarter saw, constructed in 2013, identified as the quarter log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(4) One (1) uncovered, indoor chain conveyor for conveying quartered logs to the resaws, constructed in 2013, identified as the quartered log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(5) One (1) uncovered, indoor chain conveyor for conveying quarter logs to the north resaw, constructed in 2013, identified as the north resaw conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(6) One (1) uncovered, indoor chain conveyor for conveying quarter logs to the south resaw, constructed in 2013, identified as the south resaw conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(7) One (1) uncovered, indoor belt conveyor for conveying the staves to the rip and edge saws, constructed in 2013, identified as the north heart/sap edging conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(8) One (1) uncovered, indoor belt conveyor for conveying the staves to the rip and edge saws, constructed in 2013, identified as the south heart/sap edging conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(9) One (1) uncovered, indoor belt conveyor for conveying the edged staves to the stave stacking table, constructed in 2013, identified as the stave table conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(10) One (1) uncovered, indoor belt conveyor for conveying the edged staves to the head stacking table, constructed in 2013, identified as the head table conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(11) One (1) uncovered, indoor vibrating conveyor for conveying wood waste to the chipper, constructed in 2013, identified as the chipper conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(12) One (1) uncovered belt conveyor for conveying bark waste from the debarker to an enclosed auger system, with the bark free falling into one (1) loadout trailer, constructed in 2016, with a maximum throughput of 9.37 tons per hour, uncontrolled and exhausting outdoors.

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

Emission Limitations and Standards  [326 IAC 2-6.1-5(a)(1)]

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

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the log debarker shall not exceed 42.21 pounds per hour when operating at a process weight rate of 38.625 tons per hour. The pound per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

\[ E = 55.0 P^{0.11} - 40 \]

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

(b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the chipper, sawdust handling operations, and bark loading operations shall not exceed the pound per hour limitations listed in the table below when operating at the specified process weight rate.

<table>
<thead>
<tr>
<th>Emissions Unit/Process</th>
<th>Control Device</th>
<th>Process Weight Rate (tons/hr)</th>
<th>326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hour)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chipper (SP-E11)</td>
<td>None</td>
<td>18.63</td>
<td>29.1</td>
</tr>
<tr>
<td>Sawdust Handling (DUST-C)</td>
<td>None</td>
<td>6.07</td>
<td>13.73</td>
</tr>
<tr>
<td>Sawdust Handling (DUST-B)</td>
<td>None</td>
<td>6.07</td>
<td>13.73</td>
</tr>
<tr>
<td>Bark Loading</td>
<td>None</td>
<td>9.37</td>
<td>18.36</td>
</tr>
</tbody>
</table>

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

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

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and
\( P \) = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan  [326 IAC 1-6-3]

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

Compliance Determination Requirements  [326 IAC 2-6.1-5(a)(2)]

D.1.3 Particulate Control

In order to assure that the following emission units are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the Cyclone C1 shall be in operation and control emissions from these emission units at all times that any one or more of these units are in operation:

(a) Merchandiser Saw (SP-E2)
(b) Halving Saw (SP-E3)
(c) Quarter Saw (SP-E4)
(d) Stave Saw (SP-E5a)
(e) Stave Saw (SP-E5b)
(f) Rip Saw (SP-E6a)
(g) Edging Saw (SP-E7a)
(h) Rip Saw (SP-E6b)
(i) Edging Saw (SP-E7b)
(j) Rework Saw (SP-E8)
(k) Rework Saw (SP-E9)
(l) Rework Saw (SP-E10)

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Cyclone Inspections
The Permittee shall perform inspections each calendar quarter of the Cyclone (C1) controlling particulate from associated units in Stave Mill, to verify that it is being operated and maintained in accordance with the manufacturer’s specifications. Inspections required by this condition shall not be performed in consecutive months. All defective control devices shall be replaced.

D.1.5 Cyclone Failure Detection
In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirement
(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.4.

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

#### Emissions Unit Description:

(c) One (1) natural gas-fired hydronic boiler, identified as E-6, constructed in 2016, with a maximum capacity of 0.963 million British thermal units (MMBtu) per hour, uncontrolled, and exhausting to stack S-6.

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

### Emission Limitations and Standards  [326 IAC 2-6.1-5(a)(1)]

<table>
<thead>
<tr>
<th>D.2.1 Particulate [326 IAC 6-2-4]</th>
<th>Pursuant to 326 IAC 6-2-4, particulate matter emissions from the natural gas-fired hydronic boiler (E-6), with a maximum heat input capacity of 0.963 MMBtu/hr, shall not exceed 0.6 lb/MMBtu heat input.</th>
</tr>
</thead>
<tbody>
<tr>
<td>D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]</td>
<td>A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.</td>
</tr>
</tbody>
</table>
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>725 U.S. 231</td>
</tr>
<tr>
<td>City:</td>
<td>Spencer, Indiana  47460</td>
</tr>
<tr>
<td>Phone #:</td>
<td>502-364-4563</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M119-43838-00020</td>
</tr>
</tbody>
</table>

I hereby certify that Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill is:

☐ still in operation.
☐ no longer in operation.

I hereby certify that Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill is:

☐ in compliance with the requirements of MSOP M119-43838-00020.
☐ not in compliance with the requirements of MSOP M119-43838-00020.

Authorized Individual (typed):

Title:

Signature:

Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<table>
<thead>
<tr>
<th>Noncompliance:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Limit (Tons/Year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter</td>
<td>25</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>25</td>
</tr>
<tr>
<td>Nitrogen Oxides</td>
<td>25</td>
</tr>
<tr>
<td>VOC</td>
<td>25</td>
</tr>
<tr>
<td>Hydrogen Sulfide</td>
<td>25</td>
</tr>
<tr>
<td>Total Reduced Sulfur</td>
<td>25</td>
</tr>
<tr>
<td>Sulfur Compounds</td>
<td>25</td>
</tr>
<tr>
<td>Fluorides</td>
<td>100</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>100</td>
</tr>
<tr>
<td>Any Single Hazardous Air Pollutant</td>
<td>100</td>
</tr>
<tr>
<td>Any Combination Hazardous Air Pollutant</td>
<td>100</td>
</tr>
<tr>
<td>Lead or Lead Compounds Measured as Elemental Lead</td>
<td>100</td>
</tr>
<tr>
<td>Any Source Listed under 326 IAC 2-5-1-3(2)</td>
<td>100</td>
</tr>
</tbody>
</table>

Emissions from malfunctioning control equipment or process equipment caused emissions in excess of applicable limitation ________.

This malfunction resulted in a violation of: 326 IAC _______ or, permit condition # _______ and/or permit limit of _______________.

This incident meets the definition of “malfunction” as listed on reverse side? **Y**  **N**

This malfunction is or will be longer than the one (1) hour reporting requirement? **Y**  **N**

<table>
<thead>
<tr>
<th>Information</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>COMPANY:</td>
<td></td>
</tr>
<tr>
<td>LOCATION: (CITY AND COUNTY)</td>
<td></td>
</tr>
<tr>
<td>PERMIT NO. AFS PLANT ID: AFS POINT ID:</td>
<td></td>
</tr>
<tr>
<td>CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:</td>
<td></td>
</tr>
<tr>
<td>DATE/TIME MALFUNCTION STARTED:</td>
<td></td>
</tr>
<tr>
<td>ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:</td>
<td></td>
</tr>
<tr>
<td>DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE:</td>
<td></td>
</tr>
<tr>
<td>TYPE OF POLLUTANTS Emitted: TSP, PM-10, SO2, VOC, OTHER:</td>
<td></td>
</tr>
<tr>
<td>ESTIMATED AMOUNT OF POLLUTANT Emitted DURING MALFUNCTION:</td>
<td></td>
</tr>
<tr>
<td>MEASURES TAKEN TO MINIMIZE EMISSIONS:</td>
<td></td>
</tr>
<tr>
<td>REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:</td>
<td></td>
</tr>
<tr>
<td>CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:</td>
<td></td>
</tr>
<tr>
<td>CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:</td>
<td></td>
</tr>
<tr>
<td>CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:</td>
<td></td>
</tr>
<tr>
<td>INTERIM CONTROL MEASURES: (IF APPLICABLE)</td>
<td></td>
</tr>
<tr>
<td>MALFUNCTION REPORTED BY: TITLE: (SIGNATURE IF FAXED)</td>
<td></td>
</tr>
<tr>
<td>MALFUNCTION RECORDED BY: DATE: TIME:</td>
<td></td>
</tr>
</tbody>
</table>

*SEE PAGE 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*Essential services are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

________________________________________________________________________
________________________________________________________________________
Fugitive Particulate Matter Emissions Control Plan

1) Fugitive particulate matter (dust) emissions from unpaved roads and parking lots shall be controlled by one or more of the following measures:
   a) Paving or concreting.
   b) Treating as needed with water or chemical dust suppressants.
   c) Maintain a maximum 7 mile per hour (MPH) speed limit in the yard and on site.

2) Fugitive particulate matter (dust) emissions from scrap wood and dust stockpiles shall be controlled by the following measure:
   a) Maintain minimum size and number of stock piles of scrap wood and sawdust.

3) Fugitive particulate matter (dust) emissions from outdoor conveying of dust particulates shall be controlled by one or more of the following measures:
   a) Processing only wet logs.
   b) Apply barriers (shielding) to control fugitive dust.

4) Fugitive particulate matter (dust) emissions from transporting by truck, front end loader, etc. shall be controlled by one or more of the following measures:
   a) Tarping dust/bark/chip hauling vehicles.
   b) Maintain vehicle bodies in a condition to prevent leakage.
   c) Maintain a maximum 7 mile per hour (MPH) speed limit in the yard and on site.
5) Fugitive particulate matter (dust) emissions from the loading of particulate matter (dust) shall be controlled by one or more of the following measures:

   a) Reduce free fall distance to a minimum from the dust cyclone.
   
   b) Implement the use of a screw to minimize free fall of the dust into the trailer.
   
   c) Apply barriers (shielding) to control free falling dust as needed.

6) Fugitive particulate matter (dust) emissions from material handling operations such as cutting, grinding, screening, and mixing shall be controlled by one or more the following measures:

   a) Maintain the mechanical integrity of the Dust Handling System.
   
   b) Development and Implementation of a Housekeeping and Sanitation Program.

7) Plan Implementation

   a) The effective date of this plan was 02/01/2016.
   
   b) Date of most recent update: 02/01/2016.

**DEFINITIONS:**

An “as-needed basis” means the frequency or quantity of application necessary to minimize visible particulate matter emissions.

**REFERENCE:**

On March 4, 2021, Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill relating to the operation of a stationary white oak stave mill operation. Brown-Forman Corporation d/b/a Brown-Forman Cooperage - Spencer Mill was issued its MSOP Renewal (M119-36738-00020) on March 10, 2016.

### Existing Approvals

The source was issued MSOP Renewal No. M119-36738-00020 on March 10, 2016. The source has since received the following approval:

(a) Administrative Amendment No. 119-37879-00020 on December 8, 2016.

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

### Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One Stave mill, with a maximum throughput of 900 white oak logs per day, consisting of the following woodworking equipment:

1. One (1) debarker for removing bark from fresh logs, identified as SP-E1, constructed in 2013, uncontrolled and exhausting outdoors.

2. One (1) merchandiser saw for cutting logs to the proper length, identified as SP-E2, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

3. One (1) halving saw for cutting logs in half lengthwise, identified as SP-E3, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

4. One (1) quarter saw for cutting halved logs in half length-wise, identified as SP-E4, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.
(5) Two (2) resaws saws for cutting quartered logs into stave boards, identified as SP-E5a and SP-E5b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(6) One (1) rip saw and one (1) edge saw, arranged in series, for cutting the edges of the stave, identified as SP-E6a and SP-E6b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(7) One (1) rip saw and one (1) edge saw, arranged in series, for cutting the edges of the stave, identified as SP-E7a and SP-E7b, constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(8) Three (3) rework saws, consisting of one (1) stave saw, one (1) trim saw, and one (1) heading saw, for correcting flaws in staves, identified as SP-E8, SP-E9, and SP-E10, respectively, each constructed in 2013, with sawdust collected by cyclone C1, and exhausting through stack S4.

(9) One (1) chipper, identified as SP-E11, constructed in 2016, with a maximum throughput of 225,000 board feet per day, uncontrolled, and exhausting outdoors.

(b) Sawdust handling operation, identified as DUST, with a maximum capacity of 6.07 tons per hour, constructed in 2013, using no control device, exhausting outdoors. The sawdust is collected throughout the mill by cyclone C1. Sawdust and chips from the chipper are conveyed via belt conveyor from the cyclone to an enclosed auger system (process identified as DUST-C) and free fall into two (2) loadout trailers (process identified as DUST-B).

(c) One (1) natural gas-fired hydronic boiler, identified as E-6, constructed in 2016, with a maximum capacity of 0.963 million British thermal units (MMBtu) per hour, uncontrolled, and exhausting to stack S-6.

(d) Conveyors consisting of the following:

(1) One (1) uncovered, outdoor chain conveyor for logs, constructed in 2013, identified as the merchandiser conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting outdoors.

(2) One (1) uncovered, indoor chain conveyor for conveying logs to the halving saw, constructed in 2013, identified as the halving log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(3) One (1) uncovered, indoor chain conveyor for conveying the halved logs to the quarter saw, constructed in 2013, identified as the quarter log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(4) One (1) uncovered, indoor chain conveyor for conveying quartered logs to the resaws, constructed in 2013, identified as the quartered log conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(5) One (1) uncovered, indoor chain conveyor for conveying quarter logs to the north resaw, constructed in 2013, identified as the north resaw conveyor, with a maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(6) One (1) uncovered, indoor chain conveyor for conveying quarter logs to the south resaw, constructed in 2013, identified as the south resaw conveyor, with a
maximum throughput of 38.63 tons per hour, uncontrolled and exhausting indoors.

(7) One (1) uncovered, indoor belt conveyor for conveying the staves to the rip and edge saws, constructed in 2013, identified as the north heart/sap edging conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(8) One (1) uncovered, indoor belt conveyor for conveying the staves to the rip and edge saws, constructed in 2013, identified as the south heart/sap edging conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(9) One (1) uncovered, indoor belt conveyor for conveying the edged staves to the stave stacking table, constructed in 2013, identified as the stave table conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(10) One (1) uncovered, indoor belt conveyor for conveying the edged staves to the head stacking table, constructed in 2013, identified as the head table conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(11) One (1) uncovered, indoor vibrating conveyor for conveying wood waste to the chipper, constructed in 2013, identified as the chipper conveyor, with a maximum throughput of 29.26 tons per hour, uncontrolled and exhausting indoors.

(12) One (1) uncovered belt conveyor for conveying bark waste from the debarker to an enclosed auger system, with the bark free falling into one (1) loadout trailer, constructed in 2016, with a maximum throughput of 9.37 tons per hour, uncontrolled and exhausting outdoors.

(e) Unpaved roads.

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garrettsen resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), 326 IAC 6.8 (Particulate Matter Limitations For Lake County) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset).

Enforcement Issue

In accordance with 326 IAC 2-6.1-7(b), a timely renewal application is one that is submitted at least one hundred twenty (120) calendar days prior to the expiration date of the source's existing operating permit. This source's existing permit expired on March 10, 2021. The source's permit renewal application was not received by IDEM until March 4, 2021. IDEM is reviewing this matter and will take appropriate action.
Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Owen County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO\textsubscript{2}</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O\textsubscript{3}</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM\textsubscript{2.5} standard.</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO\textsubscript{2}</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO\textsubscript{2} standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO\textsubscript{x}) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO\textsubscript{x} emissions are considered when evaluating the rule applicability relating to ozone. Owen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO\textsubscript{x} emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Other Criteria Pollutants
Owen County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

(a) The fugitive emissions of regulated pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Greenhouse Gas (GHG) Emissions

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

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

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^{1}$</td>
</tr>
<tr>
<td>---------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitives*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
</tr>
</tbody>
</table>

*Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

1. PM$_{2.5}$ listed is direct PM$_{2.5}$.
2. Single highest source-wide HAP
3. Fugitive HAP emissions are always included in the source-wide emissions.

The controls are integral for the wood working operations.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated air pollutants is less than 100 tons per year. However, PM, PM$_{10}$ and PM$_{2.5}$, each, is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

### Potential to Emit After Issuance

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Uncontrolled/Unlimited)</td>
</tr>
<tr>
<td>PM$^{1}$</td>
</tr>
<tr>
<td>---------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitives*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
</tr>
<tr>
<td>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited)</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

1. Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

2. PM$_{2.5}$ listed is direct PM$_{2.5}$.

3. Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

The controls are integral for the wood working operations.

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

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

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Federal Rule Applicability**

**New Source Performance Standards (NSPS)**

(a) The requirements of the New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are still not included for the natural gas-fired hydronic boiler (E-6), since, although this unit is considered a steam generating unit as defined in 40 CFR 60.41c, it does not have a heat input capacity from fuels combusted in the steam generating unit of greater than 2.9 MW (10 MMBtu/hr).

Steam generating unit, as defined in 40 CFR 60.41c, means a device that combusts any fuel and produces steam or heats water or heats any heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

(b) The requirements of the New Source Performance Standards (NSPS) for New Residential Hydronic Heaters and Forced-Air Furnaces, 40 CFR 60, Subpart QQQQ (326 IAC 12), are still not included for the natural gas-fired hydronic boiler (E-6), since this unit is not considered a residential hydronic heater, residential forced-air furnace, or central heater as defined in 40 CFR 60.5473. This unit is a natural gas-fired boiler.

(c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), are still not included in the permit, since the source is not engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components as defined in §63.801, and the source is not a major source of HAPs as defined in 40 CFR part 63, subpart A, §63.2.
(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD, are still not included in the permit, since this source does not perform plywood or composite wood products manufacturing as defined in §63.2292, and this source is not a major source of HAPs as defined in 40 CFR part 63, subpart A, §63.2.

A plywood and composite wood products (PCWP) manufacturing facility, as defined in §63.2292, is a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95, are still not included for the natural gas-fired hydronic boiler (E-6), since this source is not a major source of HAPs as defined in 40 CFR 63.2.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are still not included for the one (1) natural gas-fired hydronic boiler (E-6) since, although this source is located at an area source of HAPs as defined in 40 CFR 63.2, the one (1) natural gas-fired hydronic boiler (E-6) is considered a gas-fired boiler as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e).

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Preserving Area Sources, 40 CFR Part 63, Subpart QQQQQQ (63.11428 through 63.11434), are still not included in the permit because the source is not a wood preserving operation as defined by 40 CFR 63.11433. Under 40 CFR 63.11433, “wood preserving” means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Coal- and Oil-Fired Electric Utility Steam Generating Units, 40 CFR 63, Subpart UUUU, are still not included for the natural gas-fired hydronic boiler (E-6), since this unit is not considered an electric utility steam generating unit as defined in 40 CFR 63.10042.

(g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

The following state rules are applicable to the source:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.
326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
PSD applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

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

326 IAC 4-3 (Outdoor Hydronic Heaters)
Pursuant to 326 IAC 4-3-1(a), the requirements of 326 IAC 4-3 are not applicable to the one (1) natural gas-fired hydronic boiler (E-6), since this unit is not considered an outdoor hydronic heater as defined in 326 IAC 4-3-2(5).

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

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), the one (1) natural gas-fired hydronic boiler (E-6) is subject to the requirements of 326 IAC 6-2-4, since it is a source of indirect heating that was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), for a total source maximum operating capacity of less than ten (10) MMBtu per hour, the pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input shall not exceed 0.6 lb/MMBtu heat input. The total source maximum operating capacity for this source is less than ten (10) MMBtu per hour. Therefore, particulate matter emissions from the one (1) natural gas-fired hydronic boiler (E-6), with a maximum heat input capacity of 0.963 MMBtu/hr, shall not exceed 0.6 lb/MMBtu heat input.

Based on the AP42 PM emission factor (0.088 lb/MMBtu), the potential particulate emissions from the one (1) natural gas-fired hydronic boiler (E-6) is less than 0.6 lb/MMBtu. Therefore, the one (1) natural gas-fired hydronic boiler (E-6) is able to comply with this rule without the use of a control device.

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

(A) Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the log debarker (SP-E1), since it has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the log debarker shall not exceed 42.21 pounds per hour when operating at a process weight rate of 38,625 tons per hour. The pound per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

\[ E = 55.0 \ P^{0.11} - 40 \]

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

The potential particulate emissions from the log debarker are 0.93 lb/hr. Therefore, the log debarker is able to comply with this rule without the use of a control device.

(B) Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the chipper (SP-E11), sawdust handling operations (DUST-B and DUST-C) and bark loading operations, since each of these operations has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) to the chipper, sawdust handling operations, and bark loading operations shall not exceed the pound per hour limitations listed in the table below when operating at the specified process weight rate.

<table>
<thead>
<tr>
<th>Emissions Unit/Process</th>
<th>Control Device</th>
<th>Process Weight Rate (tons/hr)</th>
<th>326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hour)</th>
<th>Potential Uncontrolled Emissions (lbs/hr)</th>
<th>Potential Emissions After Controls (lbs/hr)</th>
<th>Is a Control Device Needed to Comply with 326 IAC 6-3-2 Limit?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chipper (SP-E11)</td>
<td>None</td>
<td>18.63</td>
<td>29.1</td>
<td>6.52</td>
<td>n/a</td>
<td>No</td>
</tr>
<tr>
<td>Sawdust Handling (DUST-C)</td>
<td>None</td>
<td>6.07</td>
<td>13.73</td>
<td>2.19</td>
<td>n/a</td>
<td>No</td>
</tr>
<tr>
<td>Sawdust Handling (DUST-B)</td>
<td>None</td>
<td>6.07</td>
<td>13.73</td>
<td>2.19</td>
<td>n/a</td>
<td>No</td>
</tr>
<tr>
<td>Bark Loading</td>
<td>None</td>
<td>9.37</td>
<td>18.36</td>
<td>2.81</td>
<td>n/a</td>
<td>No</td>
</tr>
</tbody>
</table>

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

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

\[ E = 4.10 \ P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and
\( P \) = process weight rate in tons per hour

(C) Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the merchandiser saw (SP-E2), halving saw (SP-E3), quarter saw (SP-E4), two (2) stave saws (SP-E5a and SP-E5b), two (2) rip saws (SP-E6a and SP-E7a), two (2) edge saws (SP-E6b and SP-E7b), three (3) rework saws (SP-E8, SP-E9, and SP-E10), and conveyors, since the potential to emit particulate matter after integral woodworking controls is less than five hundred fifty-one thousandths (0.551) pound per hour each.

In order to assure that these units are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the Cyclone C1 shall be in operation and control emissions from the merchandiser saw, halving saw, quarter saw, stave saws, rip and edge saws, and rework saws at all times that any one or more of these units are in operation.

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source was constructed after December 13, 1985 and has potential fugitive particulate emissions of twenty-five (25) tons per year or more. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan that is included as Attachment A to the permit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The uncontrolled potential to emit (PTE) sulfur dioxide (SO2) from the natural gas-fired hydronic boiler (E-6) is less than twenty-five (25) tons per year, or ten (10) pounds/hour. Therefore, the requirements of 326 IAC 7-1.1 do not apply to the natural gas-fired hydronic boiler (E-6).

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the natural gas-fired hydronic boiler (E-6) is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to the natural gas-fired hydronic boiler (E-6). There are no other 326 IAC 8 rules that are applicable to these emission unit.

326 IAC 9 (Carbon Monoxide Emission Rules)
Pursuant to 326 IAC 9-1-2(a), this source is not subject to this rule, because it does not conduct petroleum refining, ferrous metal smelting, or refuse incineration. Therefore, 326 IAC 9-1-2 does not apply.

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

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

Compliance Determination and Monitoring Requirements

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control</th>
<th>Operating Parameters</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Merchandiser Saw (SP-E2)</td>
<td></td>
<td>Cyclone (C1)</td>
<td>Once per quarter</td>
</tr>
<tr>
<td>Halving Saw (SP-E3)</td>
<td></td>
<td>Cyclone Inspections</td>
<td></td>
</tr>
<tr>
<td>Quarter Saw (SP-E4)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stave Saw (SP-E5a)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stave Saw (SP-E5b)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rip Saw (SP-E6a)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Edging Saw (SP-E7a)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rip Saw (SP-E6b)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Edging Saw (SP-E7b)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rework Saw (SP-E8)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rework Saw (SP-E9)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rework Saw (SP-E10)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cyclone (C1)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cyclone Inspections</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Once per quarter</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

These compliance monitoring requirements are necessary because the Cyclone (C1) must operate properly to assure that the above specified emission units are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional
information submitted by the applicant. An application for the purposes of this review was received on March 4, 2021.

The operation of this stationary white oak stave mill operation shall be subject to the conditions of the attached proposed MSOP Renewal No. M119-43838-00020.

The staff recommends to the Commissioner that the MSOP Renewal be approved.

<table>
<thead>
<tr>
<th>IDEM Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) If you have any questions regarding this permit, please contact Mehul Sura, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-6868 or (800) 451-6027, and ask for Mehul Sura or (317) 233-6868.</td>
</tr>
<tr>
<td>(b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a></td>
</tr>
<tr>
<td>(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <a href="http://www.in.gov/idem/airquality/2356.htm">http://www.in.gov/idem/airquality/2356.htm</a>; and the Citizens’ Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.</td>
</tr>
</tbody>
</table>
### Unlimited Potential to Emit (tons/year) (Before Integral Woodworking Controls)

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sawmill Operations</td>
<td>570.88</td>
<td>342.51</td>
<td>342.51</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Sawdust Handling</td>
<td>53.18</td>
<td>19.14</td>
<td>19.14</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas-fired Hydronic Boiler</td>
<td>0.01</td>
<td>0.03</td>
<td>0.03</td>
<td>0.00</td>
<td>0.41</td>
<td>0.02</td>
<td>0.35</td>
<td>7.8E-03</td>
<td>7.4E-03</td>
</tr>
<tr>
<td>Conveying and Bark Loading</td>
<td>17.66</td>
<td>4.92</td>
<td>4.92</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Unpaved Roads</td>
<td>16.48</td>
<td>4.39</td>
<td>0.44</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>658.21</strong></td>
<td><strong>370.99</strong></td>
<td><strong>367.04</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.41</strong></td>
<td><strong>0.02</strong></td>
<td><strong>0.35</strong></td>
<td><strong>7.8E-03</strong></td>
<td><strong>7.4E-03</strong></td>
</tr>
</tbody>
</table>

### Unlimited Potential to Emit (tons/year) (After Integral Woodworking Controls)

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOₓ</th>
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<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sawmill Operations</td>
<td>38.01</td>
<td>38.01</td>
<td>38.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Sawdust Handling</td>
<td>53.18</td>
<td>19.14</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas-fired Hydronic Boiler</td>
<td>0.01</td>
<td>0.03</td>
<td>0.03</td>
<td>0.00</td>
<td>0.41</td>
<td>0.02</td>
<td>0.35</td>
<td>7.8E-03</td>
<td>7.4E-03</td>
</tr>
<tr>
<td>Conveying and Bark Loading</td>
<td>17.66</td>
<td>4.92</td>
<td>4.92</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Unpaved Roads</td>
<td>16.48</td>
<td>4.39</td>
<td>0.44</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>125.34</strong></td>
<td><strong>66.49</strong></td>
<td><strong>62.54</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.41</strong></td>
<td><strong>0.02</strong></td>
<td><strong>0.35</strong></td>
<td><strong>0.01</strong></td>
<td><strong>0.007</strong></td>
</tr>
</tbody>
</table>

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

**Sawmill Operations**

**Sawing, Debarking, and Chipping Operations**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Throughput (logs/day)</th>
<th>Weight of Log (lbs)</th>
<th>Uncontrolled Emission Factor (lb/hr)</th>
<th>Potential Uncontrolled Emissions (lb/hr)</th>
<th>Potential Uncontrolled Emissions (tons/year)</th>
<th>Control Device</th>
<th>Control Efficiency</th>
<th>Potential Controlled Emissions (lb/hr)</th>
<th>Potential Controlled Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Log Debarker</td>
<td>SP-E1</td>
<td>900</td>
<td>2060</td>
<td>7720</td>
<td>0.024</td>
<td>0.11</td>
<td>0.93</td>
<td>4.25</td>
<td>4.06</td>
<td>18.61</td>
</tr>
<tr>
<td>Merchandiser Saw</td>
<td>SP-E2</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Flaring Saw</td>
<td>SP-E3</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Quarter Saw</td>
<td>SP-E4</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Stile Saw</td>
<td>SP-E5a</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Stile Saw</td>
<td>SP-E5b</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Rip Saw</td>
<td>SP-E6a</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Rip Saw</td>
<td>SP-E6b</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Halfing Saw</td>
<td>SP-E7a</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Halfing Saw</td>
<td>SP-E7b</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Quarter Saw</td>
<td>SP-E8</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Quarter Saw</td>
<td>SP-E9</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
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<td>4.46</td>
<td>25.85</td>
</tr>
<tr>
<td>Rework Saw</td>
<td>SP-E10</td>
<td>900</td>
<td>1560.5</td>
<td>58519</td>
<td>0.35</td>
<td>0.20</td>
<td>10.24</td>
<td>4.85</td>
<td>4.46</td>
<td>25.85</td>
</tr>
</tbody>
</table>

**Methodology**

The emission factors used in the above table are from AP-42, 4th Edition, September 1985, Table 10.3-1.

Throughput (lbs/hr) = logs/day * weight of log (lbs/log) * day/24 hours

Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) = Throughput (lbs/hr) * Emission Factor (lb/ton)

Potential Uncontrolled PM/PM10/PM2.5 (tons/year) = Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) * 8760 hr/year * 1 ton/2000 lbs

Potential Controlled PM/PM10/PM2.5 (lb/hr) = Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) * (1 - Control Efficiency)

### Additional Calculations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Throughput (bdft/day)</th>
<th>Weight of Waste Chipped (lbs/bdft)</th>
<th>Throughput (lbs/hr)</th>
<th>Uncontrolled Emission Factor (lb/hr)</th>
<th>Potential Uncontrolled Emissions (lb/hr)</th>
<th>Potential Uncontrolled Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chipper</td>
<td>200000</td>
<td>1.50</td>
<td>375000</td>
<td>0.35</td>
<td>0.2</td>
<td>6.52</td>
</tr>
</tbody>
</table>

**Methodology**

The emission factors used in the above table are from AP-42, 4th Edition, September 1985, Table 10.3-1.

Throughput (lbs/hr) = maximum bdft/day * weight of waste chipped (lbs/bdft) * 365 days/year * 1 year/8760 hours

Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) = Throughput (lbs/hr) / Emission Factor (lb/ton)

Potential Uncontrolled PM/PM10/PM2.5 (tons/year) = Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) * 8760 hr/year * 1 ton/2000 lbs

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garnett resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the cyclone controls for determining operating permit level purposes and 328 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) applicability.
## Appendix A: Emissions Calculations

### Woodworking

#### Sawdust Handling Operations

**Potential to Emit (PTE) PM, PM10, and PM2.5**

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Process Description</th>
<th>Maximum Throughput (tons/year)*</th>
<th>Maximum Throughput (tons/hour)</th>
<th>Emission Factor (lbs/ton)**</th>
<th>Pollutant</th>
<th>PTE (lbs/year)</th>
<th>PTE (lbs/hr)</th>
<th>PTE (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>DUST-C</td>
<td>Sawdust is conveyed via belt from the cyclone to an enclosed auger system</td>
<td>53180.5</td>
<td>6.07</td>
<td>1.0</td>
<td>PM</td>
<td>53180.50</td>
<td>6.07</td>
<td>26.59</td>
</tr>
<tr>
<td></td>
<td></td>
<td>53180.5</td>
<td>6.07</td>
<td>0.36</td>
<td>PM10</td>
<td>19144.98</td>
<td>2.19</td>
<td>9.57</td>
</tr>
<tr>
<td></td>
<td></td>
<td>53180.5</td>
<td>6.07</td>
<td>0.36</td>
<td>PM2.5</td>
<td>19144.98</td>
<td>2.19</td>
<td>9.57</td>
</tr>
<tr>
<td>DUST-B</td>
<td>Sawdust dropped from the enclosed auger system into two load out trailers</td>
<td>53180.5</td>
<td>6.07</td>
<td>1.0</td>
<td>PM</td>
<td>53180.50</td>
<td>6.07</td>
<td>26.59</td>
</tr>
<tr>
<td></td>
<td></td>
<td>53180.5</td>
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<td>0.36</td>
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<tr>
<td></td>
<td></td>
<td>53180.5</td>
<td>6.07</td>
<td>0.36</td>
<td>PM2.5</td>
<td>19144.98</td>
<td>2.19</td>
<td>9.57</td>
</tr>
</tbody>
</table>

* Maximum Throughput based upon 145.7 tons per day, 365 days per year.

** Sawdust handling emission factor is available only for PM10. Therefore, PM2.5 emissions were assumed equal to PM10.

### METHODOLOGY

Emission Factors are from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants EPA March 1990 for Sawmill Operations (sawdust pile handling) (SCC 3-07-008-03)

- Potential to Emit (lbs/year) = [Maximum Throughput (tons/year)] * [Emission Factor (lbs/ton)]
- Potential to Emit (lbs/year) = [Potential to Emit (lbs/year)] * [year/8760 hours]
- Potential to Emit (tons/year) = [Potential to Emit (lbs/year)] * [ton/2000 lbs]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PTE (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>53.18</td>
</tr>
<tr>
<td>PM10</td>
<td>19.14</td>
</tr>
<tr>
<td>PM2.5</td>
<td>19.14</td>
</tr>
</tbody>
</table>

Total: 13.72651296
### Appendix A: Emissions Calculations

#### Natural Gas-fired Hydronic Boiler

**MM BTU/HR <100**

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmBtu</td>
<td>mmscf</td>
</tr>
<tr>
<td>1.0</td>
<td>1020</td>
<td>8.3</td>
</tr>
</tbody>
</table>

#### Pollutant Emission Factors

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.01</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.03</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.03</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.00</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.41</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.02</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.35</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.**

**Emission Factors for NOx:**
- Uncontrolled = 100
- Low NOx Burner = 50
- Low NOx Burners/Flue gas recirculation = 32

#### Methodology

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

#### Hazardous Air Pollutants (HAPs)

##### HAPs - Organics

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>3.4E-03</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>8.7E-06</td>
<td>5.0E-06</td>
<td>3.1E-04</td>
<td>0.01</td>
<td>1.4E-05</td>
<td>0.01</td>
</tr>
</tbody>
</table>

##### HAPs - Metals

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>2.1E-03</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.1E-06</td>
<td>4.5E-06</td>
<td>5.8E-06</td>
<td>1.6E-06</td>
<td>8.7E-06</td>
<td>2.3E-05</td>
</tr>
</tbody>
</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations
Material Conveying and Bark Loading

### Material Conveying

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Capacity (ton/hr)</th>
<th>Number of Conveyors</th>
<th>type of activity from AP-42</th>
<th>Uncontrolled Emission Factor (lb/ton)</th>
<th>Unlimited/Uncontrolled PTE (lb/hr)</th>
<th>Unlimited/Uncontrolled PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chain Conveyors</td>
<td>38.63</td>
<td>6</td>
<td>conveyor transfer point (SCC 3-05-020-06)</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.0011</td>
</tr>
<tr>
<td>Conveyors</td>
<td>29.26</td>
<td>6</td>
<td>conveyor transfer point (SCC 3-05-020-06)</td>
<td>0.003</td>
<td>0.0011</td>
<td>0.0011</td>
</tr>
</tbody>
</table>

**Total** | 1.22 | 0.45 | 0.45 | 5.35 | 1.96 | 1.96 |

**Methodology**

Particulate emissions from conveyors were estimated using emission factors for conveyor transfer points from AP-42, Table 11.19.2-2 Emission Factors for Crushed Stone Processing and Pulverized Mineral Processing (PM2.5 emissions assumed equal to PM10 emissions, since there is no PM2.5 emission factor for conveyor transfer points for crushed stone processing operations.)

Unlimited/Uncontrolled PTE (lb/hr) = Maximum Capacity (ton/hr) x Number of Conveyors x Uncontrolled Emission Factor (lb/ton)

Unlimited/Uncontrolled PTE (ton/yr) = Unlimited/Uncontrolled PTE (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

### Bark Loading

<table>
<thead>
<tr>
<th>Process</th>
<th>Bark Conveyed (lbs/hr)</th>
<th>Maximum Throughput (ton/hr)</th>
<th>Uncontrolled Emission Factor (lb/ton)</th>
<th>Unlimited/Uncontrolled PTE (lb/hr)</th>
<th>Unlimited/Uncontrolled PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer of bark to load-out trailer*</td>
<td>18731</td>
<td>9.37</td>
<td>PM</td>
<td>PM10</td>
<td>PM2.5</td>
</tr>
</tbody>
</table>

**Total** | 2.81 | 0.67 | 0.67 | 12.31 | 2.95 | 2.95 |

**Methodology**

Particulate emissions from bark loading were estimated using emission factors for Fines Screening from AP-42, Table 11.19.2-2 Emission Factors for Crushed Stone Processing and Pulverized Mineral Processing (PM2.5 emissions assumed equal to PM10 emissions, since there is no PM2.5 emission factor for fines screening for crushed stone processing operations.)

Maximum Throughput (ton/hr) = Bark Conveyed (lbs/hr) x 1 ton/2000 lb

Unlimited/Uncontrolled PTE (lb/hr) = Maximum Throughput (ton/hr) x Uncontrolled Emission Factor (lb/ton)

Unlimited/Uncontrolled PTE (ton/yr) = Unlimited/Uncontrolled PTE (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)
Appendix A: Emissions Calculations

Fugitive Dust Emissions - Unpaved Roads

Fugitive Emissions

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Maximum one-way trips per day per vehicle (trip/day)</th>
<th>Maximum trips per day (tons/trip)</th>
<th>Maximum Weight Loaded per day (tons/trip)</th>
<th>Maximum Weight driven per day (tons/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way miles (miles/trip)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-axle log trailer entering</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3-axle log trailer leaving</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3-axle stave trailer entering</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3-axle stave trailer leaving</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2-axle loader in log yard</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Average Vehicle Weight Per Trip = 23.1 tons/trip
Average Miles Per Trip = 0.25 miles/trip

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

where \( k = \) [2576.8 6631.2 1258.1 2225 0.421 0.051 0.04 1065 23.1 0.42 0.260 lb/mi  =  particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)

0.421 35.0 50%
0.42 0.85 3.13 = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

2.91 5.0
2.60
0.96
0.127 3.20
39.5
630.0 = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

0.127 196.0
14.0 0.83 1.0 0.083 0.77 (pursuant to control measures outlined in fugitive dust control plan)

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

Mitigated Emission Factor, \( E_{ext} = E * \frac{365 - P}{365} \) (Equation 2 from AP-42 13.2.2)

where \( P = \) 175 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

Unmitigated Emission Factor, \( EF = \) 4.97 1.32 0.13 lb/mile
Mitigated Emission Factor, \( E_{ext} = \) 4.97 1.32 0.13 lb/mile

Dust Control Efficiency = 50% 50% 50%

(pursuant to control measures outlined in fugitive dust control plan)

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-axle log trailer entering</td>
<td>4.76 1.27 0.127</td>
<td>4.76 1.27 0.127</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
</tr>
<tr>
<td>3-axle log trailer leaving</td>
<td>4.76 1.27 0.127</td>
<td>4.76 1.27 0.127</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
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<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
</tr>
<tr>
<td>3-axle stave trailer entering</td>
<td>4.76 1.27 0.127</td>
<td>4.76 1.27 0.127</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
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<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
</tr>
<tr>
<td>3-axle stave trailer leaving</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
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<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
<td>2.91 0.77 0.077</td>
</tr>
<tr>
<td>2-axle loader in log yard</td>
<td>9.74 2.60 0.260</td>
<td>9.74 2.60 0.260</td>
<td>9.74 2.60 0.260</td>
<td>9.74 2.60 0.260</td>
<td>9.74 2.60 0.260</td>
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<td>9.74 2.60 0.260</td>
<td>9.74 2.60 0.260</td>
<td>9.74 2.60 0.260</td>
</tr>
</tbody>
</table>

Totals 25.07 6.68 0.668 16.48 4.39 0.44 8.24 2.20 0.22

Methodology

Total Weight driven per day (tons/day) = \( \frac{\text{Maximum Weight Loaded (tons/trip)} \times \text{Maximum trips per day (trip/day)}}{\text{Maximum one-way distance (feet/trip)} / 5280 \text{ ft/mile}} \)

Maximum one-way distance (mi/trip) = \( \text{Maximum trips per year (trip/day)} \times \text{Maximum one-way distance (mi/trip)} \)

Average Vehicle Weight Per Trip (ton/trip) = \( \text{Total Weight driven per day (tons/day)} / \text{Maximum trips per day (trip/day)} \)

Average Miles Per Trip (miles/trip) = \( \text{Maximum Weight driven per day (tons/day)} / \text{Maximum one-way distance (mi/trip)} \)

Unmitigated PTE (tons/yr) = \( \text{Maximum one-way miles (miles/yr)} \times \text{Unmitigated Emission Factor (lb/mile)} \times \text{tons/2000 lbs} \)

Mitigated PTE (tons/yr) = \( \text{Maximum one-way miles (miles/yr)} \times \text{Mitigated Emission Factor (lb/mile)} \times \text{tons/2000 lbs} \)

Controlled PTE (tons/yr) = \( \text{Mitigated PTE (tons/yr)} \times (1 - \text{Dust Control Efficiency}) \)

Abbreviations

PM = Particulate Matter
PM0 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
Cordon Porter  
Brown-Forman Corporation d/b/a Brown-Forman Cooperage – Spencer Mill  
850 Dixie Hwy  
Louisville, KY 40210

Re: Public Notice  
Brown-Forman Corporation d/b/a Brown-Forman Cooperage – Spencer Mill  
Permit Level: MSOP Renewal  
Permit Number: 119-43838-00020

Dear Mr. Porter:

Enclosed is a copy of the preliminary findings for your draft air permit, including the draft permit, Technical Support Document, emission calculations, and the Notice of 30-Day Period for Public Comment.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment (without supporting documents) has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/public-notices/.

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

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

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Mehul Sura, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-6868 or dial (317) 233-6868.

Sincerely,

Theresa Weaver  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 8/10/2020
May 17, 2021
To: Owen County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Brown-Forman Corporation d/b/a Brown-Forman Cooperage – Spencer Mill
Permit Number: 119-43838-00020

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smidie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

May 17, 2021

Brown-Forman Corporation d/b/a Brown-Forman Cooperage – Spencer Mill
119-43838-00020

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/public-notices/.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 2/28/2020
<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Cordon Porter  Brown Forman Corporation dba Brown Forman Cooperage 850 Dixie Hwy Louisville KY 40210 (Source CAATS)</td>
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<td>Greg Roshkowski  Brown Forman Corporation dba Brown Forman Cooperage 880 Dixie Hwy Louisville KY 40210 (RO CAATS)</td>
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<td>Owen County Health Department 86 East Market Street Spencer IN 47460 (Health Department)</td>
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<td>Owen County Public Library 10 S Montgomery St Spencer IN 47460-1898 (Library)</td>
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<td>Mr. Richard Monday 545 E. Margaret Dr. Terre Haute IN 47801 (Affected Party)</td>
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<td>Owen County Commissioners Courthouse Spencer IN 47460 (Local Official)</td>
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<td>Spencer Town Council 90 N. West St. Spencer IN 47460 (Local Official)</td>
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The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.