



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

For Buckskin Properties, LLC in Gibson County

Permit No. M051-34363-00056

The Indiana Department of Environmental Management (IDEM) has received an application from Buckskin Properties, LLC located at 8278 S 850 E, Elberfeld, Indiana 47613 for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Buckskin Properties, LLC to construct and operate a new stationary engineered wood grinding operation for the production of animal bedding.

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

Fort Branch Public Library
107 E Locust St.
Fort Branch, IN 47648

and

IDEM Southwest Regional Office
1120 N. Vincennes Ave.
Petersburg, IN 47567

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

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M051-34363-00056 in all correspondence.

Comments should be sent to:

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

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

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 and the IDEM Southwest Regional Office, 1120 N. Vincennes Ave., Petersburg, IN 47567.

If you have any questions please contact Brian Wright of my staff at the above address.



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

BW



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Commissioner

DRAFT

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Buckskin Properties, LLC
8278 S 850 E
Elberfeld, Indiana 47613**

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 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. M051-34363-00056	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 engineered wood grinding operation for the production of animal bedding.

Source Address:	8278 S 850 E, Elberfeld, Indiana 47613
General Source Phone Number:	812-923-5111
SIC Code:	2499 (Wood Products, Not Elsewhere Classified), 0751 (Livestock Services, except Veterinary)
County Location:	Gibson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Wood grinding operations, approved in 2014 for construction, consisting of the following:
- (1) One (1) grinder, identified as unit A, approved in 2014 for construction, with a maximum capacity of 15 tons of wood per hour, and powered by a non-road diesel engine.
 - (2) Conveying of ground wood from the grinder to a hopper, with a maximum loading rate of 15 tons per hour.
 - (3) Unloading of offsite ground wood from a truck to a hopper using a front end loader, with a maximum unloading rate of 15 tons per hour.
 - (4) One (1) hopper, identified as unit B, approved in 2014 for construction, with a maximum capacity of 15 tons of wood per hour.
 - (5) Conveying of ground wood from the hopper to a scalper, with a maximum loading rate of 15 tons per hour.
- (b) Wood processing operations, approved in 2014 for construction, conveying materials between units through tunnel conveyors, using a cyclone and baghouse E as particulate control, and consisting of the following:
- (1) One (1) scalper, identified as unit C, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.
 - (2) One (1) hammermill, identified as unit D, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.

- (3) One (1) screener, identified as unit G, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.
- (4) Conveying of ground wood from the screener to the loading area through a tunnel conveyor, with a maximum loading rate of 15 tons per hour.
- (c) Transfer of ground wood within a storage building by front-end loader to a truck, with a maximum loading rate of 15 tons per hour.
- (d) 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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, M051-34363-00056, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 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.6 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.7 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.8 Property Rights or Exclusive Privilege

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

B.9 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.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M051-34363-00056 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.13 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.14 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.15 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.16 Source Modification Requirement

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

B.17 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.18 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.19 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 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 construct and 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(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (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, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall 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 facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Wood grinding operations, approved in 2014 for construction, consisting of the following:
 - (1) One (1) grinder, identified as unit A, approved in 2014 for construction, with a maximum capacity of 15 tons of wood per hour, and powered by a non-road diesel engine.
 - (2) Conveying of ground wood from the grinder to a hopper, with a maximum loading rate of 15 tons per hour.
 - (3) Unloading of offsite ground wood from a truck to a hopper using a front end loader, with a maximum unloading rate of 15 tons per hour.
 - (4) One (1) hopper, identified as unit B, approved in 2014 for construction, with a maximum capacity of 15 tons of wood per hour.
 - (5) Conveying of ground wood from the hopper to a scalper, with a maximum loading rate of 15 tons per hour.

- (b) Wood processing operations, approved in 2014 for construction, conveying materials between units through tunnel conveyors, using a cyclone and baghouse E as particulate control, and consisting of the following:
 - (1) One (1) scalper, identified as unit C, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.
 - (2) One (1) hammermill, identified as unit D, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.
 - (3) One (1) screener, identified as unit G, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.
 - (4) Conveying of ground wood from the screener to the loading area through a tunnel conveyor, with a maximum loading rate of 15 tons per hour.

(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 Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the operations shall not exceed the pound per hour limits listed in the table below:

Unit Description	Maximum Process Weight Rate (tons/hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)
Grinder (Unit A)	15	25.16
Conveying of ground wood from the grinder to hopper	15	25.16
Unloading of offsite ground wood from truck to hopper	15	25.16
Conveying of ground wood from the hopper to a scalper	15	25.16
Hammermill (Unit D)	15	25.16
Screener (Unit G)	15	25.16
Conveying of ground wood from the screener to loading area	15	25.16
Conveying of ground wood from the screener to loading area	15	25.16

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:

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

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

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

**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).

Company Name:	Buckskin Properties, LLC
Address:	8278 S 850 E
City:	Elberfeld, Indiana 47613
Phone #:	812-923-5111
MSOP #:	M051-34363-00056

I hereby certify that Buckskin Properties, LLC is :

still in operation.

no longer in operation.

I hereby certify that Buckskin Properties, LLC is :

in compliance with the requirements of MSOP M051-34363-00056.

not in compliance with the requirements of MSOP M051-34363-00056.

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.

Noncompliance:

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.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. 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

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*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:

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

Buckskin Properties, LLC
8278 S 850 E
Elberfeld, Indiana 47613

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Buckskin Properties, LLC 8278 S 850 E, Elberfeld, Indiana 47613, completed construction of the engineered wood grinding operation for the production of animal bedding on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 28, 2014 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M051-34363-00056, Plant ID No. 051-00056 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

Attachment A

Fugitive Dust Control Plan

Buckskin Properties, LLC
Elberfeld, IN 47613
Source Identification No. 051-00056

Section 1 - Introduction

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust generated from paved roadways and areas, unpaved roadways and areas, wood recyclable material piles, and grinding and transfer of wood outdoors in order to prevent fugitive dust from crossing 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 Limitations).

The plan shall be implemented on a year-round basis until such a time as another plan is approved or ordered by the Indiana Department of Environmental Management.

The person on site who is responsible for implementing the plan is:

Site Manager
Buckskin Properties, LLC
Elberfeld, IN 47613

Initial Demonstration

Buckskin Properties, LLC will conduct sampling of the mulch material contained in the storage piles and will send these samples to a testing lab to determine silt content.

The typical silt content is less than 1% of the total weight (particle size of approximately 70 microns as measured by a 200 mesh screen) and the unpaved areas and mulch and scrap wood piles are not anticipated to contribute substantially to fugitive dust.

Section 2 - Grinding Operations

An horizontal style grinder shall be used to contain and control fugitive particulate matter emissions from all outdoor grinding of wood recyclable material to prevent fugitive dust from crossing the Buckskin Properties, LLC property line.

Section 3 - Paved Roads and Areas

Dust from the paved driveway and areas will be controlled by sweeping and shall be performed every 30 days to prevent visible fugitive dust from crossing the Buckskin Properties, LLC property line, as determined by a trained employee, from these areas. A trained employee is defined as an employee that has worked at the source at least one (1) month and has been trained to determine whether fugitive dust emissions from paved roads and areas are in compliance with 326 IAC 6-4 (Fugitive Dust Emissions Limitations). Records of sweeping will be required.

Exceptions - Cleaning of paved roads and areas may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The road segments or areas is closed or abandoned. Abandoned roads or areas will be barricaded to prevent vehicle access.
- (c) It is raining at the time of the scheduled cleaning.

Section 4 - Working Areas

Works areas at the facility shall be kept pushed up so the mulches or wood are in piles. The large piles help reduce dust as traffic is not running over the mulch. If needed a water wagon or sprinkler will be used to maintain adequate moisture to minimize fugitive dust and prevent visible fugitive dust from crossing the Buckskin Properties, LLC property line, as determined by a trained employee, from these areas. A trained employee shall perform visual observations for fugitive dust once daily and records shall be kept of these observations in the journal. A trained employee is defined as an employee that has worked at the source at least one (1) month and has been trained to determine whether fugitive dust emissions from unpaved roads and working areas are in compliance with 326 IAC 6-4 (Fugitive Dust Emissions Limitations). Records of applying water onto unpaved roads and working areas shall also be required.

The trained employee shall determine if the moisture content of the mulch is adequate to eliminate the formation of visible dust from equipment traffic on a daily basis and record observations. The observation and records of water application shall be maintained.

Section 5 - Open Wood Recyclable Material Piles

Open wood recyclable material piles will consist of only ground wood, mulch, scrap wood, or other recyclables. Water suppression will be applied as needed, however, excessive moisture promotes increased degradation rates and fire hazard through spontaneous combustion. Buckskin Properties, LLC works to maintain an approximate moisture content in the mulch piles and monitors internal pile temperatures to avoid spontaneous combustion.

Water shall be applied, as necessary, to the wood recyclable material piles to prevent emission of fugitive particulate matter from crossing the Buckskin Properties, LLC property line, as determined by a trained employee, from these areas. A trained employee shall perform visual observations for fugitive dust once

daily and a record shall be kept of these observations in the journal. Areas producing visible emissions shall be treated with water as needed and records of spraying water onto piles shall also be maintained.

Section 6 - Material Handling

Material handling equipment will be used to maintain the wood recyclable material piles. Fugitive particulate matter from loading and unloading of outdoor wood recyclable material piles shall be controlled by minimizing drop height for operation of the grinder and immersion in water for the mulch dyeing operation.

Drop heights shall be minimized to minimize fugitive emissions. Grinder operators will be trained to adjust the belt height during grinder operation to minimize fugitive dust with an operational objective of maintaining a drop of no more than 4 feet in height. The mulch dyeing process involves immersion in a water-based dye. After dyeing, the wet mulch is re-piled while still wet.

Section 7 - Monitoring and Record Keeping

Records shall be kept in a journal, which will be updated daily by the responsible official. The journals shall be kept in storage for a minimum of three (3) years and shall be available for inspection or copying upon reasonable prior notice. The following information will be required in the journal with each entry:

Paved Roads and Areas

- (a) Name of trained employee making observations
- (b) Record of the dates when areas are swept or reason for exemption from sweeping

Work Areas and Wood Recyclable Material Piles

- (a) Name of trained employee making observations
- (b) Date and time the observations were made and whether visible emissions were occurring
- (c) Date and time when water is applied

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

Technical Support Document (TSD) for a New Source Construction and
Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name: Buckskin Properties, LLC
Source Location: 8278 S 850 E, Elberfeld, IN 47613
County: Gibson
SIC Code: 2499 (Wood Products, Not Elsewhere Classified), 0751 (Livestock Services, except Veterinary)
Operation Permit No.: M051-34363-00056
Permit Reviewer: Brian Wright

On March 28, 2014, the Office of Air Quality (OAQ) received an application from Buckskin Properties, LLC related to the construction and operation of a new stationary engineered wood grinding operation for the production of animal bedding.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Gibson County.

Pollutant	Designation
SO ₂	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Attainment effective October 27, 2011, for the annual PM _{2.5} standard for Montgomery Township. Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard for the remainder of the county.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Gibson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Gibson County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Gibson County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria 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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Buckskin Properties, LLC on March 28, 2014, relating to the construction and operation of a stationary engineered wood grinding operation for the production of animal bedding.

The source consists of the following permitted emission units:

- (a) Wood grinding operations, approved in 2014 for construction, consisting of the following:
- (1) One (1) grinder, identified as unit A, approved in 2014 for construction, with a maximum capacity of 15 tons of wood per hour, and powered by a non-road diesel engine.
 - (2) Conveying of ground wood from the grinder to a hopper, with a maximum loading rate of 15 tons per hour.
 - (3) Unloading of offsite ground wood from a truck to a hopper using a front end loader, with a maximum unloading rate of 15 tons per hour.
 - (4) One (1) hopper, identified as unit B, approved in 2014 for construction, with a maximum capacity of 15 tons of wood per hour.
 - (5) Conveying of ground wood from the hopper to a scalper, with a maximum loading rate of 15 tons per hour.
- (b) Wood processing operations, approved in 2014 for construction, conveying materials between units through tunnel conveyors, using a cyclone and baghouse E as particulate control, and consisting of the following:
- (1) One (1) scalper, identified as unit C, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.

- (2) One (1) hammermill, identified as unit D, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.
- (3) One (1) screener, identified as unit G, with a maximum capacity of 15 tons per hour, and venting to a cyclone and baghouse E.
- (4) Conveying of ground wood from the screener to the loading area through a tunnel conveyor, with a maximum loading rate of 15 tons per hour.
- (c) Transfer of ground wood within a storage building by front-end loader to a truck, with a maximum loading rate of 15 tons per hour.
- (d) Unpaved roads.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	167.39
PM10 ⁽¹⁾	165.05
PM2.5	164.33
SO ₂	0
NO _x	0
VOC	0
CO	0
GHGs as CO ₂ e	0
TOTAL HAPs	0

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM₁₀ and PM_{2.5} (including fugitive and non-fugitive emissions) is greater than one hundred (100) tons per year. However, since this type of operation is not one of the twenty-eight (28) listed source categories under 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 Part 70 Permit applicability. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE 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.

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII (60.4200 through 60.4219) (326 IAC 12) are not included in this permit for the one (1) diesel engine associated with the grinder (unit A), since this unit is not a stationary internal combustion engine as defined by 40 CFR 60.4219. This engine is considered a nonroad engine.
- (b) 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)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) (326 IAC 20-82), are not included in this permit for the one (1) diesel engine associated with the grinder (unit A), since this unit is not a stationary internal combustion engine as defined by 40 CFR 63.6675. This engine is considered a nonroad engine.
- (d) 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)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). The potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit 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 2-4.1.

- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the grinder operation and loading operation have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is subject to the requirements of 326 IAC 6-5, because the grinder operation and loading operation have potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, which is included as Attachment A to the permit.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Grinding Operation

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to each of the operations in the table below, 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) emissions from the following operation shall not exceed the pounds per hour limitations as follows:

Emission Unit Description	Maximum Process Weight Rate (tons/hour)	326 IAC 6-2-3 Allowable Particulate Emissions (lbs/hour)	Uncontrolled PTE of PM (lbs/ hour)
Grinder (Unit A)	15	25.16	5.25
Conveying of ground wood from the grinder to hopper	15	25.16	4.50
Unloading of offsite ground wood from truck to hopper	15	25.16	4.50
Conveying of ground wood from the hopper to a scalper	15	25.16	4.50

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:

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

Since the uncontrolled PM emissions are less than the 326 IAC 6-2-3 allowable particulate emission rates, these operations are each able to comply with the 326 IAC 6-2-3 allowable particulate emission rate without the use of a control device.

Wood Processing Operation

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to each of the operations in the table below, 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) emissions from the following operation shall not exceed the pounds per hour limitations as follows:

Emission Unit Description	Maximum Process Weight Rate (tons/hour)	326 IAC 6-2-3 Allowable Particulate Emissions (lbs/hour)	Uncontrolled PTE of PM (lbs/ hour)
Hammermill (Unit D)	15	25.16	5.25
Screener (Unit G)	15	25.16	4.50
Conveying of ground wood from the screener to loading area	15	25.16	4.50

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:

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

Since the uncontrolled PM emissions are less than the 326 IAC 6-2-3 allowable particulate emission rates, these operations are each able to comply with the 326 IAC 6-2-3 allowable particulate emission rate without the use of a control device.

Truck Loading

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the truck loading operation, 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) emissions from the following operation shall not exceed the pounds per hour limitations as follows:

Emission Unit Description	Maximum Process Weight Rate (tons/hour)	326 IAC 6-2-3 Allowable Particulate Emissions (lbs/hour)	Uncontrolled PTE of PM (lbs/ hour)
Transfer of ground wood within a storage building by front-end loader to a truck	15	25.16	4.50

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

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

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

Since the uncontrolled PM emissions are less than the 326 IAC 6-2-3 allowable particulate emission rates, the truck loading operation is able to comply with the 326 IAC 6-2-3 allowable particulate emission rate without the use of a control device.

Compliance Determination, Monitoring and Testing Requirements

There are no compliance determination and monitoring requirements applicable to this source.

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 28, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M051-34363-00056. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Buckskin Properties, LLC
Source Address: 8278 S 850 E, Elberfeld, IN 47613
Permit Number: M051-34363-00056
Reviewer: Brian Wright

Uncontrolled/Unlimited Potential to Emit (PTE) (tons/year)

Emission Units	PM	PM-10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single HAP
Non-Fugitive										
Diesel Engine (Grinder)*	0.00	0.00	0.00	0	0	0	0	0	0	0
Wood Processing	62.42	62.42	62.42	0	0	0	0	0	0	0
Fugitive										
Truck Loading (fugitive)	19.71	19.71	19.71	0	0	0	0	0	0	0
Wood Grinding and Ground Wood Loading Operations (fugitive)	82.13	82.13	82.13	0	0	0	0	0	0	0
Unpaved Roads (fugitive)	3.14	0.80	0.08	0	0	0	0	0	0	0
Total (Non-fugitive)	62.42	62.42	62.42	0	0	0	0	0	0	0
Total (Fugitive)	104.98	102.64	101.92	0	0	0	0	0	0	0
Total (Non-fugitive and Fugitive)	167.39	165.05	164.33	0	0	0	0	0	0	0

*The diesel engine is a nonroad engine. Therefore, emissions from the diesel engine are not included in the potential to emit of the source.

**Appendix A: Emission Calculations
Wood Grinding and Ground Wood Transfer**

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

Company Name: Buckskin Properties, LLC
Source Address: 8278 S 850 E, Elberfeld, IN 47613
Permit Number: M051-34363-00056
Reviewer: Brian Wright

Wood Grinding

Process	Emission Factor (lb/ton)*	Maximum Capacity (ton/hour)	PTE of PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 (tons/yr)
Grinder	0.35	15	5.25	23.00
PTE			5.25	23.00

*Grinder particulate emissions are estimated using emission factor (lb/ton) from AP-42, Fourth Edition 1985, Chapter 10.3, Table 10.3-1 (log sawing)

Ground Wood Conveying

Process	Emission Factor (lb/ton)**	Maximum Capacity (ton/hour)	PTE of PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 (tons/yr)
Conveying of ground wood from the grinder to hopper	0.30	15	4.50	19.71
Unloading of offsite ground wood from truck to hopper	0.30	15	4.50	19.71
Total			4.50	39.42

Hopper

Process	Emission Factor (lb/ton)**	Maximum Capacity (ton/hour)	PTE of PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 (tons/yr)
Conveying of ground wood from the hopper to a scalper	0.30	15	4.50	19.71
Total			4.50	19.71

Total PTE of PM/PM10/PM2.5 (tons/year)	82.13
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Methodology

*Emission Factor is from Fire Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants

**The wood grinder produces ground wood similar in size to mulch (not sawdust). Worst case particulate emissions from ground wood drop points are estimated using emission factors for Fines Screening from AP-42 Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, Table 11.19.2-2 (dated 8/04).

PTE of PM/PM10/PM2.5 (lbs/hour) = Emission Factor (lb/ton) x Maximum Capacity (ton/hour)

PTE of PM/PM10/PM2.5 (tons/year) = PTE of PM/PM10/PM2.5 (lbs/hour) x 8760 (hours/year) x (1 ton/2000 pounds)

**Appendix A: Emission Calculations
Wood Processing Operations***

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

Company Name: Buckskin Properties, LLC
Source Address: 8278 S 850 E, Elberfeld, IN 47613
Permit Number: M051-34363-00056
Reviewer: Brian Wright

Scalper

Particulate emissions from the scalper are assumed to be negligible.

Hammermill

Process	Emission Factor (lb/ton)*	Maximum Capacity (ton/hour)	PTE of PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 (tons/yr)
Hammermill	0.35	15	5.25	23.00
PTE			5.25	23.00

*Hammermill particulate emissions are estimated using emission factor (lb/ton) from AP-42, Fourth Edition 1985, Chapter 10.3, Table 10.3-1 (log sawing)

Screener

Process	Emission Factor (lb/ton)**	Maximum Capacity (ton/hour)	PTE of PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 (tons/yr)
Screener	0.30	15	4.50	19.71
Conveying of ground wood from the screener to loading area	0.30	15	4.50	19.71
Total			4.50	39.42

Total PTE of PM/PM10/PM2.5 (tons/year)	62.42
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Methodology

Conveyors between the different units are enclosed (tunnel conveyors), so emissions are negligible for transport between units

*Hammermill particulate emissions are estimated using emission factor (lb/ton) from AP-42, Fourth Edition 1985, Chapter 10.3, Table 10.3-1 (log sawing)

**The hammermill and screener produce ground wood animal bedding that is larger than sawdust. Worst case particulate emissions from ground wood drop points are estimated using emission factors for Fines Screening from AP-42 Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, Table 11.19.2-2 (dated 8/04).
PTE of PM/PM10/PM2.5 (lbs/hour) = Emission Factor (lb/ton) x Maximum Capacity (ton/hour)
PTE of PM/PM10/PM2.5 (tons/year) = PTE of PM/PM10/PM2.5 (lbs/hour) x 8760 (hours/year) x (1 ton/2000 pounds)

**Appendix A: Emission Calculations
Truck Loading (Fugitive)**

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

Company Name: Buckskin Properties, LLC
Source Address: 8278 S 850 E, Elberfeld, IN 47613
Permit Number: M051-34363-00056
Reviewer: Brian Wright

Process	Emission Factor (lb/ton)*	Maximum Capacity (ton/hour)	PTE of PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 (tons/yr)
Transfer of ground wood within a storage building by front-end loader to a truck	0.30	15	4.50	19.71
Total			4.50	19.71

Methodology

**The ground wood animal bedding manufactured at this site is larger than sawdust. Worst case particulate emissions from ground wood drop points are estimated using emission factors for Fines Screening from AP-42 Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, Table 11.19.2-2 (dated 8/04).

PTE of PM/PM10/PM2.5 (lbs/hour) = Emission Factor (lb/ton) x Maximum Capacity (ton/hour)

PTE of PM/PM10/PM2.5 (tons/year) = PTE of PM/PM10/PM2.5 (lbs/hour) x 8760 (hours/year) x (1 ton/2000 pounds)

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads (Fugitive)

Company Name: Buckskin Properties, LLC
Address City IN Zip: 8278 S 850 E, Elberfeld, IN 47613
Permit Number: M051-34363-00056
Reviewer: Brian Wright

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi (entering plant) (one-way trip)	1.0	24.0	24.0	18.0	432.0	792	0.150	3.6	1314.0
Semi (leaving plant) (one-way trip)	1.0	24.0	24.0	40.0	960.0	300	0.057	1.4	497.7
Front loader (entering plant) (one-way trip)	1.0	20.0	20.0	7.0	140.0	211	0.040	0.8	291.7
Vehicle (leaving plant) (one-way trip)	1.0	20.0	20.0	8.0	160.0	211	0.040	0.8	291.7
Totals			88.0		1692.0			6.6	2395.2

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

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	19.2	19.2	19.2	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

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

Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$
 where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	5.95	1.52	0.15	lb/mile
Mitigated Emission Factor, $E_{ext} =$	3.91	1.00	0.10	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	3.91	1.00	0.100	2.57	0.66	0.066	1.29	0.33	0.033
Vehicle (leaving plant) (one-way trip)	0.87	0.22	0.022	0.57	0.15	0.015	0.29	0.07	0.007
Totals	4.78	1.22	0.122	3.14	0.80	0.080	1.57	0.40	0.040

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

May 21, 2014

Mr. Larry Fox
Buckskin Properties, LLC
8991 Louis Smith Road
Borden, IN 41706

Re: Public Notice
Buckskin Properties, LLC
Permit Level: New Source Construction &
Minor Source Operating Permit
Permit Number: 051-34363-00056

Dear Mr. Fox:

Enclosed is a copy of your draft New Source Construction & Minor Source Operating Permit, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Fort Branch Public Library, 107 E Locust Street in Fort Branch, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Princeton Daily Clarion in Princeton, Indiana publish this notice no later than May 23, 2014.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



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Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

May 21, 2014
Buckskin Properties, LLC
051-34363-00056

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 21, 2014

Princeton Daily Clarion
100 North Gibson
PO Box 30
Princeton, IN 47670

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Buckskin Properties, LLC, Gibson County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than May 23, 2014.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1003, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call «admincontact» at 800-451-6027 and ask for extension «extension» or dial 317-23«extension».

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: New Source Construction & Minor Source Operating Permit
Permit Number: 051-34363-00056

Enclosure
PN Newspaper.dot 6/13/2013



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May 21, 2014

To: Fort Branch Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Buckskin Properties, LLC
Permit Number: 051-34363-00056

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

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


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

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

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

Enclosures
PN Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 5/21/2014 Buckskin Properties LLC 051-34363-00056 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Larry Fox Buckskin Properties LLC 8991 Louis Smith Rd Borden IN 47106 (Source CAATS)										
2		The Fort Branch Public Library 107 E Locust St Fort Branch IN 47648-1499 (Library)										
3		Gibson County Health Department 203 S Prince Street, Suite A Princeton IN 47670 (Health Department)										
4		Eric Anderson 25 Atlantic Avenue Erlanger KY 41018 (Affected Party)										
5		Gibson County Commissioners 101 N. Main Street Princeton IN 47670 (Local Official)										
6		Oakland City Town Council and Mayors Office 210 E. Washington St. Oakland City IN 47660 (Local Official)										
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
8		Mr. Bil Musgrove PO Box 520 Chandler IN 47610 (Affected Party)										
9		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
10		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
11		George Ballard 112 E emerson Street Princeton IN 47670 (Affected Party)										
12		Jeffery Meade 101 N. Main Street Princeton IN 47670 (Affected Party)										
13		Andy Schafer North Annex, 225 N Hart Street Princeton IN 47670 (Affected Party)										
14												
15												

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