



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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December 10, 2024

VIA ELECTRONIC MAIL

Mr. Bryan Foley
Georgia-Pacific Gypsum LLC
484 East County Road 1400 North
Wheatfield, IN 46392
Bryan.foley@gapac.com

Re: Short Term Backup Unit
Georgia-Pacific Gypsum LLC
Source ID 073-00031
Wheatfield, Jasper County

Dear Mr. Bryan Foley:

On October 1, 2024, Georgia-Pacific Gypsum LLC submitted a letter notifying the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), of the intention to temporarily replace a permitted emission unit for the purpose of repairing or performing maintenance on the permitted unit.

Short Term Backup Unit Operation General Information:

Unit:	FGD Storage Bin (EU 0301)
Location of the Operation:	484 East County Road 1400 North, Wheatfield, IN 46392
County:	Jasper County
County Status:	Attainment
Purpose of the Unit:	The FGD storage bin (EU 0301) delivers synthetic gypsum to the wallboard manufacturing process via the FGD Bin discharge conveyor (EU 0307).
Starting Date of the Operation:	September 29, 2024
Duration of the Operation:	Less than 180 days of total operating time.

Applicable Requirements:

Pursuant to 326 IAC 2-1.1-3(h)(4), the above-mentioned short-term backup unit shall satisfy the following requirements:

1. The repair or planned maintenance event of the permitted emission unit being taken offline is not a major source or modification as defined under 326 IAC 2-2 or 326 IAC 2-3. [326 IAC 2-1.1-3(h)(4)(A)]

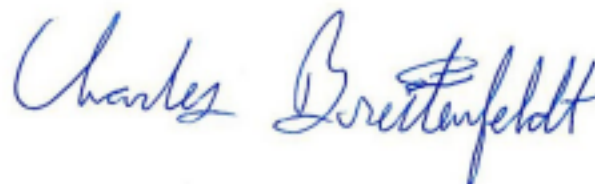
2. The short-term backup unit is subject to the same permit terms, conditions, and limits that apply to the permitted emission unit.
[326 IAC 2-1.1-3(h)(4)(B)]
3. A fuel combusted in the short-term backup unit must be of the same type and grade that is combusted in the permitted emission unit.
[326 IAC 2-1.1-3(h)(4)(C)]
4. If the permitted emission unit has a control device, the short-term backup unit must have a control device that meets the following requirements:
[326 IAC 2-1.1-3(h)(4)(D)]
 - (a) The type of control device on the short-term backup unit must be the same as the type of control device on the permitted emission unit.
 - (b) The control efficiency of the control device on the short-term backup unit must be greater than or equal to the control efficiency of the control device on the permitted emission unit.
 - (c) A control device on the short-term backup unit must operate at all times that the control device on the permitted emission unit would have been required to operate.
5. The throughput rate of the short-term backup unit must not exceed the throughput rate the permitted emission unit. [326 IAC 2-1.1-3(h)(4)(E)]
6. The short-term backup unit must not be in operation at the same time as the permitted emission unit. [326 IAC 2-1.1-3(h)(4)(F)]
7. A short-term backup unit must not be on the property of the permitted source for more than one hundred eighty (180) calendar days from the day the short-term backup unit is placed on site, except as provided under 326 IAC 2-1.1-3(h)(4)(I). [326 IAC 2-1.1-3(h)(4)(G)]
8. Upon completion of the repair or planned maintenance event on the permitted emission unit, the short-term backup unit must be removed from the property of the permitted source within fourteen (14) calendar days.
[326 IAC 2-1.1-3(h)(4)(H)]
9. The short-term backup unit may be temporarily transferred to replace another permitted emission unit on the same property if:
[326 IAC 2-1.1-3(h)(4)(I)]
 - (a) the prior use of the short-term backup unit has been completed and the department has been notified in accordance with the provisions of 326 IAC 2-1.1-3(h)(4)(K).
 - (b) the owner or operator informs the department of the intent to use the short-term backup unit in place of a different permitted emission unit and provides notice in accordance with 326 IAC 2-1.1-3(h)(4)(J); and
 - (c) use of the short-term backup unit continues to comply with 326 IAC 2-1.1-3(h)(4).

10. The owner or operator shall provide a written notice to the department of the proposed placement of the short-term backup unit on the property of the permitted source not later than seven (7) days before a planned maintenance, or not later than three (3) days after the placement of the short-term backup unit in the case of a malfunction, emergency, or operational failure. The notice must contain the following information: [326 IAC 2-1.1-3(h)(4)(J)]
 - (a) For a planned maintenance, the following:
 - (1) A description of the planned maintenance including the proposed repairs.
 - (2) The start date of the planned maintenance.
 - (3) The anticipated duration of the planned maintenance.
 - (b) For a malfunction, emergency, or operational failure, the following:
 - (1) A description of the malfunction, emergency, or operational failure.
 - (2) A description of the nature and extent of the repairs.
 - (3) The date of the malfunction, emergency, or operational failure.
 - (4) The anticipated duration of the repairs.
 - (c) A listing of associated equipment and emission control devices of the short-term backup unit, with specifications.
 - (d) A preventive maintenance plan for the short-term backup unit containing the following information:
 - (1) Identification of each person responsible for inspecting, maintaining, and repairing the short-term backup unit and any associated emission control devices.
 - (2) A description and inspection schedule for the items or conditions to be inspected.
 - (3) Identification and quantification of the appropriate level of replacement parts for the short-term backup unit to be maintained in inventory at the permitted source.
11. The owner or operator shall provide a written notice to the department not later than seven (7) days after the repair or maintenance has been completed with the following information: [326 IAC 2-1.1-3(h)(4)(K)]
 - (a) The actual arrival and departure dates of the short-term backup unit on the property of the permitted source.
 - (b) A statement certifying the following:
 - (1) The permitted emission unit and the short-term backup unit were never operated at the same time.

- (2) The short-term backup unit was never operated at a throughput rate that exceeded the throughput rate of the permitted emission unit.
- (3) The short-term backup unit has been removed from the property of the permitted source or has been transferred to a different emission unit on the same property in accordance with 326 IAC 2-1.1-3(h)(4)(I).

Please direct any questions to, Ms. Jessica Linscott, at 219-216-3657 or by email at jlinscot@idem.in.gov.

Sincerely,



Charles Breitenfeldt, Deputy Director
Northwest Regional Office

cc: NWRO