



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Koetter Woodworking, Inc., Borden, Indiana

FROM: Giles Chickering, Physical Scientist
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Koetter Woodworking, Inc.

Facility Location: 533 Louis Smith Road, Borden, Indiana 47106

Date of Inspection: November 14, 2024

EPA Inspector(s):

1. Giles Chickering, Physical Scientist
2. Kenneth Ruffatto, Environmental Engineer

Other Attendees:

1. Kory Byrne, EH&S Manager, Koetter
2. Clark Gregory, Director of Maintenance, Koetter

Contact Email Address: koryb@koetterwoodworking.com

Purpose of Inspection: Clean Air Act inspection, Title V

Facility Type: Woodworking facility

Regulations Central to Inspection: State implementation plan, Title V permit

Arrival Time: 10:00 AM EST

Facility Name: Koetter Woodworking, Inc.
Facility Location: 533 Louis Smith Road, Borden, Indiana 47106
Date of Inspection: November 14, 2024

Departure Time: 11:15 AM EST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet: Sent with document request
- ☒ Provided CBI warning to facility

The following information was obtained verbally from facility staff unless otherwise noted.

Process Description:

Koetter woodworking receives green lumber from different mills via truck. The lumber is dried in several kilns onsite, which are heated by a central woodchip-fired boiler with an ethylene glycol system for heat transfer. Supplemental wood with higher heating value is trucked in to add to the mostly poplar woodchips that do not produce enough BTUs to power the kilns. The dried lumber is separated by wood species and processed in the facility, where wood is planed, ripped, cut, shaped, and assembled into various home interior products and doors. The boiler has a single exhaust stack for emissions. The woodworking areas/machines are fitted with cyclones and baghouses for dust collection. Baghouses are monitored for visible emissions and pressure drops; some are automated while others are checked manually on daily or weekly walkthroughs. White dust, collected from plywood/treated/manufactured materials is collected separately and not burned in the wood boiler system. Filters control emissions from the coating/vacuum coating and painting operations and are inspected monthly. The facility staff conducts overspray monitoring weekly and check the emissions system on the roof monthly. Finished products are stored in a sales building before shipping via truck to distributors.

Staff Interview: Koetter started in 1959 and currently has approximately 310 employees. The facility is limited to 24.5 tons of VOC per year from coating and painting operations. Staff estimate the facility currently emits about 1 ton per year. A spray line for doors is planned to be added in 2025.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

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EPA observed visible opacity from the wood fired boiler stack and discussed it with the facility staff. EPA asked facility staff for records of a stack test on the unit. The facility does not have records of performance testing.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

The following items were requested from the facility:

1. Most recent performance test report of the wood chip boiler stack (Stack S-2)
 - a. Data on particulate matter (PM) from stack (pounds per million BTU heat input), if available in report or elsewhere
 - b. Opacity data if available on report
 - c. Records of cyclone downtime in 2024 used to control PM emissions to Stack S-2, if available
2. Any cyclone downtime records for the wood boiler for the past year
3. Records of visible emissions checks in 2024
4. Any standard operating procedure used for visible emissions checks, if available
5. Log of coating and paint usage including type, monthly usage, and volatile organic compound (VOC)/hazardous air pollutant (HAP) content for the past year
6. Copy of preventative maintenance plan

DIGITAL SIGNATURES

Report Author: GILES CHICKERING Digitally signed by GILES CHICKERING
Date: 2024.12.13 08:48:13 -06'00'

Section Supervisor: SARAH MARSHALL Digitally signed by SARAH MARSHALL
Date: 2024.12.13 11:13:56 -06'00'