

April 1, 2003

Mr. Terry Ong
Inland Paperboard and Packaging, Inc.
7536 Miles Drive
Indianapolis, Indiana 46231

RE: Minor Source Operating Permit
MSOP 097-15453-00154

Dear Mr. Ong:

Enclosed is a Minor Source Operating Permit issued in approval of the Inland Paperboard and Packaging, Inc. printing operation, located at 7536 Miles Drive, Indianapolis, Indiana 46231.

Please note that this approval has been issued with certain conditions. If the conditions are not acceptable, contact the Indianapolis Office of Environmental Services (OES) by letter or telephone within fifteen (15) days from the date of this letter. The Division will arrange a meeting to discuss the conditions in questions. If no agreement is reached, the Indianapolis Air Pollution Control Board may be petitioned within fifteen (15) days of the date of the meeting. The Board, after public notice and hearing, may sustain, modify, or rescind the conditions. Note that additional conditions may be included in the Operating Permit issued for the above equipment.

Please keep this Permit (or a copy) on file at the facility (specified in the Permit) available for inspection by the OES and IDEM, Office of Air Quality (OAQ) personnel.

If you have any questions, please contact Ms. Angelique Oligier at (317) 327-2846. Thank you for your time and cooperation in this matter.

Sincerely,

Original Signed by John B. Chavez
John B. Chavez, Administrator

aco

Attachments: MSOP # 097-15453-00154
TSD

**INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL
SERVICES**

MINOR SOURCE OPERATING PERMIT

**Inland Paperboard and Packaging, Inc.
7536 Miles Drive
Indianapolis, Indiana 46231**

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

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

| | |
|---|--|
| Operation Permit No.: MSOP 097-15453-00154 | |
| Issued by: Original Signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services | Issuance Date: April 1, 2003 Expiration Date: April 1, 2008 |

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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) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 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 portable printing press.

Authorized Individual: Terry Ong
Source Address: 7536 Miles Drive, Indianapolis, IN 46231
Mailing Address: 7536 Miles Drive, Indianapolis, IN 46231
General Source Phone: (317) 481-4000
SIC Code: 2796
County Location: Marion
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source under PSD
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Three (3) flexographic printing presses (Emission Unit ID 001), installed in 1992, with a maximum line speed of 1200 square feet per minute (sq. ft./min.) and a maximum print width of 96 inches (in.), constructed September, 1992, exhausting at three (3) stacks, identified Stack ID 01, 02, and 03.
- (b) Three (3) natural gas fired driers (Emission Unit ID 002), installed in 1992, two (2) with a maximum capacity of 2.75 million Btu per hour (MM BTU/hr.), and one (1) with maximum capacity of 8.0 million Btu per hour (MM BTU/hr.) constructed September, 1992, exhausting at three (3) stacks, identified Stack ID 01, 02, and 03.
- (c) One (1) 3002i DuPont Platemaking equipment (Emission Unit ID 003), installed in 1992 with a maximum operating capacity of 487,000 square feet per year (sq. ft./yr.), constructed December 28, 1998, exhausting at one (1) stack, identified Stack ID 04.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.3 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.4 Minor Source Operating Permit [326 IAC 2-6.1]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Local Agency Requirement

An application for an operation permit must be made ninety (90) days before start up to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

The operation permit issued by Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis Office of Environmental Services (OES) shall contain as a minimum the conditions in the Operation Conditions section of this permit.

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Section,
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

- (d) 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, and OES on or before the date it is due.

B.7 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) within ninety (90) after issuance of this permit, including the following information on each emissions unit:

- (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:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Section,
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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 Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- | | | |
|------------------------------------|------------|---|
| Compliance Data Section | | Office of Environmental Services |
| Office of Air Quality | and | Air Quality Management Section, |
| 100 North Senate Avenue | | Compliance Data Group |
| P.O. Box 6015 | | 2700 South Belmont Avenue |
| Indianapolis, IN 46206-6015 | | Indianapolis, Indiana 46221-2097 |

Any such application shall be certified by an “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 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]

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, OES, 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) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.3 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.4 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:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Section,
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

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. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Section,
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

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 date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES if the source 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.6 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

C.7 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.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.9 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.10 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- (c) The annual emission statement 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, and OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location 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 Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.12 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:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Section,
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

- (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, and IOES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Three (3) flexographic printing presses (Emission Unit ID 001), with a maximum line speed of 1200 square feet per minute (sq. ft./min.) and a maximum print width of 96 inches (in.), constructed September, 1992, exhausting at three (3) stacks, identified Stack ID 01, 02, and 03.
- (b) Three (3) natural gas fired driers (Emission Unit ID 002), two (2) with a maximum capacity of 2.75 million Btu per hour (MM BTU/hr.), and one (1) with maximum capacity of 8.0 million Btu per hour (MM BTU/hr.) constructed September, 1992, exhausting at three (3) stacks, identified Stack ID 01, 02, and 03.
- (c) One (1) 3002i DuPont Platemaking equipment (Emission Unit ID 003) with a maximum operating capacity of 487,000 square feet per year (sq. ft./yr.), constructed December 28, 1998, exhausting at one (1) stack, identified Stack ID 04.

Emission Limitations and Standards

D.1.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.2 Graphic Arts Operations [326 IAC 8-5-5]

Any change or modification which would increase the potential to emit VOC from any one of the presses to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ, and OES, and shall be subject to 326 IAC 8-5-5.

D.1.3 Major Sources of Hazardous Air Pollutants [326 IAC 2-4.1]

Any change or modification which would increase the potential to emit for the presses to emit a single hazardous air pollutant (HAP) to ten (10) tons per year or more or a combination of HAPs to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ, and OES and may be subject to the requirements of 326 IAC 2-4.1.

Record Keeping and Reporting Requirements [326 IAC 2-6]

D.1.4 Record Keeping Requirements

To document compliance with D.1.2 and D.1.3, the Permittee shall maintain records of the VOC content of each coating material and solvent used and the HAP content of the coating material and the solvent used.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**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: | Inland Paperboard and Packaging, Inc. |
| Address: | 7536 Miles Drive |
| City: | Indianapolis, Indiana 46231 |
| Phone #: | (317) 481-4000 |
| MSOP #: | 097-15453-00154 |

I hereby certify that Inland Paperboard and Packaging, Inc. is still in operation.
 no longer in operation.

I hereby certify that Inland Paperboard and Packaging, Inc. is in compliance with the requirements of MSOP 097-15453-00154.
 not in compliance with the requirements of MSOP 097-15453-00154.

| |
|---------------------------------------|
| 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
FAX NUMBER - 317 233-5967**

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 ?_____, 100TONS/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: ____/____/19____ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ 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

**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:

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Inland Paperboard and Packaging, Inc.
Source Location: 7536 Miles Drive, Indianapolis, Indiana 46231
County: Marion
SIC Code: 2796
Operation Permit No.: 097-15453-00154
Permit Reviewer: Angelique Oligier

The Indianapolis Office of Environmental Services (OES) has reviewed an application from Inland Paperboard and Packaging, Inc. relating to the operation of a portable printing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following existing permitted emission units and pollution control devices:

- (a) Three (3) flexographic printing presses (Emission Unit ID 001), installed in 1992, with a maximum line speed of 1200 square feet per minute (sq. ft./min.) and a maximum print width of 96 inches (in.), constructed September, 1992, exhausting at three (3) stacks, identified Stack ID 01, 02, and 03.
- (b) Three (3) natural gas fired driers (Emission Unit ID 002), installed in 1992, two (2) with a maximum capacity of 2.75 million Btu per hour (MM BTU/hr.), and one (1) with maximum capacity of 8.0 million Btu per hour (MM BTU/hr.) constructed September, 1992, exhausting at three (3) stacks, identified Stack ID 01, 02, and 03.
- (c) One (1) 3002i DuPont Platemaking equipment (Emission Unit ID 003) with a maximum operating capacity of 487,000 square feet per year (sq. ft./yr.), constructed December 28, 1998, exhausting at one (1) stack, identified Stack ID 04.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 093-0154-01, issued on August 12, 1992,
- (b) OP 154-01, issued on April 5, 1993,
- (c) CP-098-0154-01, issued on December 29, 1998.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Length x Width (feet) | Flow Rate (acfm) | Temp. (°F) |
|----------|---|---------------|-----------------|-----------------------|------------------|------------|
| 01 | printing presses and natural gas fired driers | 46 | | 2.5 x 2 | 17,525 | 150-225 |
| 02 | printing presses and natural gas fired driers | 46 | | 2.5 x 2 | 12,600 | 150-225 |
| 03 | printing presses and natural gas fired driers | 46 | | 3 x 3.5 | 28,000 | 150-225 |
| 04 | Platemaking equipment | 33 | 0.833 | | 1,450 | 74 |

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

A complete application for the purposes of this review was received on January 15, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 0.81 |
| PM-10 | 0.81 |
| SO ₂ | 0.03 |
| VOC | 63.08 |
| CO | 4.97 |

| | |
|-----------------|------|
| NO _x | 5.91 |
| HAPs | 9.00 |

| HAP's* | Potential To Emit (tons/year) |
|---------|-------------------------------|
| ethanol | 9.00 |
| TOTAL | 9.00 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year. Therefore, the source is subject of the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions for all emissions units from the source. This information reflects the 2001 OES emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 0.2665 |
| PM-10 | negligible |
| SO ₂ | 0.0018 |
| VOC | 20.89225 |
| CO | 0.105 |
| NO _x | 1.035 |
| HAP | negligible |

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

| Process/facility | Limited Potential to Emit (tons/year) | | | | | | |
|------------------------|---------------------------------------|------------|-----------------|--------------|------------|-----------------|-------------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAP |
| Presses | -- | -- | -- | 46.04 | -- | -- | 1.03 |
| Dryers | 0.8 | 0.8 | -- | 0.3 | 5.0 | 5.9 | -- |
| Platemaking equipment | -- | -- | -- | 18.07 | -- | -- | -- |
| Total Emissions | 0.8 | 0.8 | -- | 64.41 | 5.0 | 5.9 | 1.03 |

County Attainment Status

The source is located in Marion County.

| Pollutant | Status |
|-----------------|------------------------|
| PM-10 | attainment |
| SO ₂ | maintenance attainment |
| NO ₂ | attainment |
| Ozone | maintenance attainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant | Emissions (ton/yr) |
|-----------------|--------------------|
| PM | 0.8 |
| PM10 | 0.8 |
| SO ₂ | 0 |
| VOC | 64.41 |
| CO | 5.0 |
| NO _x | 5.9 |
| HAP | 1.03 |

- (a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This source is subject to the requirements to obtain a minor source operating permit under 326 IAC 2-6.1 because it has the potential to emit of VOC greater than 25 tons per year.
- (c) These emissions were based on data submitted to OES in March, 2001.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit CP-980154-01, is still not subject

to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Because this source does not use rotogravure printing, 40 CFR Part 60 Subpart QQ does not apply to the facility.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source. Because this source is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR Part 63.2, 40 CFR Part 63 Subpart KK and 40 CFR Part 63 Subpart JJJJ do not apply to the facility, despite the operation of a wide-web flexographic printing press.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Nonattainment Area Limitations)

Inland Paperboard and Packaging, Inc. has the potential to emit less than one hundred (100) tons and has actual emissions of less than ten (10) tons (based on 2001 OES emissions data) of particulate matter per year. Therefore, 326 IAC 6-1-2 does not apply.

326 IAC 6-2 (Particulate Emission Limitation for Sources of Indirect Heating)

This rule establishes emission limitations for particulate emissions from sources of indirect

heating (boilers) located anywhere in the state. This source does not have any boilers, therefore, 326 IAC 6-2 does not apply to these facilities.

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

This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. The printing presses and platemaking activities at this source do not produce particulate emissions. Therefore, 326 IAC 6-3 does not apply to these facilities.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Inland Paperboard and Packaging, Inc. has no facility with potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

326 IAC 8-5-5 (Graphic Arts Operations)

Inland Paperboard and Packaging, Inc. has no facility with potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-5-5 does not apply.

Conclusion

The operation of this stationary printing operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-15453-00154.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Inland Paperboard and Packaging, Inc.
Address City IN Zip: 7536 Miles Drive, Indianapolis, Indiana 46231
Reviewer: Angelique Olinger
Date: 02/13/03

number of presses 3

| THROUGHPUT | | | | | | | |
|--------------|--------------------------------|---------------------------|-------------------------------|----------------|-----------------|-----------|---|
| Press I.D. | MAXIMUM LINE SPEED FEET MIN | CONVERT FEET TO INCHES | MAXIMUM PRINT WIDTH INCHES | 60 MIN HOUR | 8760 HR YEAR | 1/1000000 | Throughput MMin ² /YEAR (1) |
| flexographic | 1200 | 12 | 96 | 60 | 8760 | 1000000 | 2179768 |

(1) Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

PTE for VOCs

| Compound Name (Compound with highest VOC content) | Maximum Coverage lbs/ MMin ² | Weight % Volatiles* | Flash Off % | Through Put MMin ² / Year | Tons 2000 lbs | Tons Year (2) |
|--|--|---------------------|-------------|---|------------------|------------------|
| flint ink | 0.09175287 | 15% | 100.00% | 2179768 | 2000 | 14.90 |
| | | | | | | |

| | |
|----------------------------------|---------------|
| VOC (tons/yr) All Presses | 44.70 |
| VOC (lbs/day) All Presses | 244.93 |

(2) VOC = Maximum Coverage pounds per MMin² * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Appendix A: Emissions Calculations

HAPs From Printing Press Operations

Company Name: Inland Paperboard and Packaging, Inc.
Address City IN Zip: 7536 Miles Drive, Indianapolis, Indiana 46231
Reviewer: Angelique Oligier
Date: 02/13/03

number of presses 3

| THROUGHPUT | | | | | | | |
|--------------|--------------------------------|---------------------------|-------------------------------|----------------|-----------------|-----------|---|
| Press I.D. | MAXIMUM LINE SPEED FEET MIN | CONVERT FEET TO INCHES | MAXIMUM PRINT WIDTH INCHES | 60 MIN HOUR | 8760 HR YEAR | 1/1000000 | Throughput MMin ² /YEAR (1) |
| flexographic | 1200 | 12 | 96 | 60 | 8760 | 1000000 | 2179768 |

(1) Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

PTE for VOCs

| Compound Name (Compound with highest VOC content) | Maximum Coverage lbs/ MMin ² | Weight % ethanol | Flash Off % | Through Put MMin ² / Year | Tons 2000 lbs | Tons Year (2) |
|--|--|------------------|-------------|---|------------------|------------------|
| flint ink | 0.09175287 | 3% | 100.00% | 2179768 | 2000 | 3.00 |
| | | | | | | |

| | |
|----------------------------------|--------------|
| VOC (tons/yr) All Presses | 9.00 |
| VOC (lbs/day) All Presses | 49.32 |

(2) VOC = Maximum Coverage pounds per MMin² * Weight % ethanol * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

**Appendix A: Emission Calculations
Natural Gas Combustion Only**

**Company Name: Inland Paperboard and Packaging, Inc.
Address City IN Zip: 7536 Miles Drive, Indianapolis, Indiana 46231
MSOP: 097-15453-00154
Reviewer: Angelique Oliger
Date: 01/29/03**

| | | |
|---------------------------------------|-------------|---|
| Heat Input Capacity (MMBtu/hr) | 2.8 | Natural Gas Potential Throughput (MMCF/yr) |
| | 2.8 | |
| | 8 | |
| TOTAL | 13.5 | 118.3 |

| | Pollutant | | | | | |
|-----------------------------|-----------|--------|--------|--------|--------|--------|
| | PM | PM10 | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 13.7 | 13.7 | 0.6 | 100.0 | 5.3 | 84.0 |
| Potential to Emt in tons/yr | 0.8101 | 0.8101 | 0.0355 | 5.9130 | 0.3134 | 4.9669 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emissions Calculations

*Limiting factor of production is the solvent recovery system, limited to 48 Plates/day.

* For a DuPont Plate, 34.6 % of solvent is lost in the air.

* 7.15 lb/gal of VOC is in the OptiSol In-Line Solution

* Maximum capacity is 487,000 Ft²/year or 55.59 Ft²/Hour

Emission Factor Calculations:

$$\begin{aligned}
 &= \frac{0.03 \text{ Gallons Solvent}}{\text{Ft}^2 \text{ Plate}} * \frac{7.15 \text{ lbs}}{\text{Gallon}} \\
 &= \frac{0.2145 \text{ lbs VOC}}{\text{Ft}^2 \text{ Plate}} * 0.346 \text{ (per DuPont Plate)} \\
 &= \mathbf{0.074217 \text{ lb VOC}} \\
 &\quad \mathbf{\text{Ft}^2 \text{ of DuPont Plate}}
 \end{aligned}$$

Potential Emission Calculations (8760 hr/year):

$$\begin{aligned}
 &= \frac{55.59 \text{ Ft}^2}{\text{Hr}} * \frac{0.074217 \text{ lb VOC}}{\text{Ft}^2} \\
 &= \frac{4.125 \text{ lb VOC}}{\text{Hr}} = \frac{99 \text{ lb VOC}}{\text{Day}} \\
 &= \frac{4.125 \text{ lb VOC}}{\text{Hr}} * \frac{8760 \text{ Hr}}{\text{Yr}} * \frac{1 \text{ Ton}}{2000 \text{ lb}} \\
 &= \mathbf{18.07 \text{ Tons VOC}} \\
 &\quad \mathbf{\text{Yr}}
 \end{aligned}$$