INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Inland Display and Packaging Solutions
55740 Currant Road
Mishawaka, Indiana 46545

(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 141-17168-00547	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 5, 2004 Expiration Date: April 5, 2009

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

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 conversion of kraft paper into corrugated containers manufacturing plant used in shipping and display of customer products.

Authorized Individual:	Vice President and General Manager
Source Address:	55740 Currant Road, Mishawaka, Indiana 46545
Mailing Address:	55740 Currant Road, Mishawaka, Indiana 46545
General Source Phone:	(574) 259-7981
SIC Code:	2653
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Minor Source Operating Permit Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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) Printing Operations (identified as EU04) consisting of:

(1) One (1) flexographic printing press (identified as press ID 121), printing corrugated paper and fiberboard at a maximum line speed of 116 feet per minute. This unit was constructed in 1982.

(2) One (1) flexographic printing press (identified as press ID 132), printing corrugated paper and fiberboard at a maximum line speed of 133 feet per minute. This facility was constructed in 1988.

(3) One (1) flexographic printing press (identified as press ID 143), printing corrugated paper and fiberboard at a maximum line speed of 131feet per minute. This facility was constructed in 1998.

(4) One (1) flexographic printing press (identified as press ID 145), printing corrugated paper and fiberboard at a maximum line speed of 82.6 feet per minute. This facility was constructed in 1998.

(5) One (1) flexographic printing press (identified as press ID 128), printing corrugated paper and fiberboard at a maximum line speed of 27.7 feet per minute. This facility was constructed in 2000.

(6) One (1) flexographic printing press (identified as press ID 134), printing corrugated paper and fiberboard at a maximum line speed of 133 feet per minute. This facility was constructed in 2001.

(7) One (1) flexographic printing press (identified as press ID 129), printing corrugated paper and fiberboard at a maximum line speed of 58.5 feet per minute. This facility was constructed in 2003.

(b) Two (2) pneumatic trim collection systems (identified as EU05 and EU06) used to collect scrap cardboard pieces from the two (2) corrugators and three (3) diecutters. The pneumatic trim collection system uses two (2) cyclones (identified as CE05 and CE06), which are integral to the collection system. EU05 was constructed in 1997 and EU06 was constructed in 2001.

(1) One (1) diecutter (identified as DC1), with a maximum throughput rate of 22,450 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(2) One (1) diecutter (identified as DC2), with a maximum throughput rate of 16,881 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(3) One (1) diecutter (identified as DC3) , with a maximum throughput rate of 15,888 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(4) One (1) corrugator (identified as CO1), with a maximum throughput rate of 22,568 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(5) One (1) corrugator (identified as CO2), with a maximum throughput rate of 8,151 pounds per hour, and connected to the pneumatic trim collection system (identified as EU06).

(c) One (1) corn starch handling and storage silo (identified as EU03), with a maximum capacity of 100,000 pounds, using a baghouse (identified as BH03) as control, and exhausting at stack ID 03. This unit was installed in 1997.

(d) One (1) natural gas-fired Kewanee boiler (identified as EU01), with a maximum heat input capacity of 25.11 MMBtu per hour, exhausting at stack ID 01. This unit was installed in 1997.

(e) One (1) natural gas-fired Clayton boiler (identified as EU02), with a maximum heat input capacity of 6.70 MMBtu per hour, exhausting at stack ID 002. This unit was installed in 2001.

(f) One (1) gluing process, with a maximum usage rate of 12.4 pounds per hour, applied using a flowcoater. This unit was installed in 2002.

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 Definitions

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.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 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.5 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.6 NSPS Reporting Requirement

Pursuant to the New Source Performance Standards (NSPS), Part 60, Subpart Dc, the Permittee is hereby advised of the requirement to report the following at the appropriate times:

(a) Commencement of construction date (no later than 30 days after such date);

(b) Actual start-up date (within 15 days after such date); and

(c) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

B.7 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 Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(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, on or before the date it is due.

B.8 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) days (this time frame is determined on a case by case basis but no more than ninety (90) days) 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:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or

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

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

B.9 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:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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)]

(d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.10 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] [IC13-17-3-2][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 this title or the conditions of this permit or any operating permit revisions;

(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 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) 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.11 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, 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, 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.12 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

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

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

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 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
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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) 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 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.6 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 than180 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:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
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 local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 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.8 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.9 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.10 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

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

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.11 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.12 Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

(1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

(b) The 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, on or before the date it is due.

C.13 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, all record keeping requirements not already legally required shall be implemented when operation begins.

C.14 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 Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(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) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do 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:

(a) Printing Operations (identified as EU04) consisting of:

(1) One (1) flexographic printing press (identified as press ID 121), printing corrugated paper and fiberboard at a maximum line speed of 116 feet per minute. This unit was constructed in 1982.

(2) One (1) flexographic printing press (identified as press ID 132), printing corrugated paper and fiberboard at a maximum line speed of 133 feet per minute. This facility was constructed in 1988.

(3) One (1) flexographic printing press (identified as press ID 143), printing corrugated paper and fiberboard at a maximum line speed of 131feet per minute. This facility was constructed in 1998.

(4) One (1) flexographic printing press (identified as press ID 145), printing corrugated paper and fiberboard at a maximum line speed of 82.6 feet per minute. This facility was constructed in 1998.

(5) One (1) flexographic printing press (identified as press ID 128), printing corrugated paper and fiberboard at a maximum line speed of 27.7 feet per minute. This facility was constructed in 2000.

(6) One (1) flexographic printing press (identified as press ID 134), printing corrugated paper and fiberboard at a maximum line speed of 133 feet per minute. This facility was constructed in 2001.

(7) One (1) flexographic printing press (identified as press ID 129), printing corrugated paper and fiberboard at a maximum line speed of 58.5 feet per minute. This facility was constructed in 2003.

(f) One (1) gluing process, with a maximum usage rate of 12.4 pounds per hour, applied using a flowcoater. This unit was installed in 2002.

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-7] [40 CFR 63, Subpart KK]

(a) The potential to emit VOC from the entire source is less than one hundred (100) tons per year. Any change or modification which would increase the potential to emit of VOC equal to or greater than one hundred (100) tons per year must receive prior approval from IDEM, OAQ.

(b) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of any combination of HAPs is less than twenty-five (25) tons per year from the entire source. Any change or modification which would increase the potential to emit of a single HAP equal to or greater than ten (10) tons per year, and the potential to

emit of any combination of HAPs equal to or greater than twenty-five (25) tons per year must receive prior approval from IDEM, OAQ.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.2 Volatile Organic Compounds (VOC)

Compliance with the VOC and HAP usage limitation contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limit established in Condition D.1.1.

(1) The VOC and HAP content of each coating material and solvent used.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(2) The cleanup solvent usage for each month;

(3) The total VOC and HAP usage for each month; and

(4) The weight of VOCs and HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(b) Two (2) pneumatic trim collection systems (identified as EU05 and EU06) used to collect scrap cardboard pieces from the two (2) corrugators and three (3) diecutters. The pneumatic trim collection system uses two (2) cyclones (identified as CE05 and CE06), which are integral to the collection system. EU05 was constructed in 1997 and EU06 was constructed in 2001.

(1) One (1) diecutter (identified as DC1), with a maximum throughput rate of 22,450 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(2) One (1) diecutter (identified as DC2), with a maximum throughput rate of 16,881 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(3) One (1) diecutter (identified as DC3) , with a maximum throughput rate of 15,888 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(4) One (1) corrugator (identified as CO1), with a maximum throughput rate of 22,568 pounds per hour, and connected to the pneumatic trim collection system (identified as EU05).

(5) One (1) corrugator (identified as CO2), with a maximum throughput rate of 8,151 pounds per hour, and connected to the pneumatic trim collection system (identified as EU06).

(c) One (1) corn starch handling and storage silo (identified as EU03), with a maximum capacity of 100,000 pounds, using a baghouse (identified as BH03) as control, and exhausting at stack ID 03. This unit was installed in 1997.

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

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the three (3) diecutters, two (2) corrugators, and one (1) corn starch silo, shall not exceed the pounds per hour emission limits listed in the table below:

Emission Units	Process Weight (lb per hour)	Process Weight (ton per hour)	Particulate Emission Limit (lb per hour)
Corn Starch Silo	732	0.37	2.09
Diecutter 1	22,450	11.2	20.7
Diecutter 2	16,881	8.44	17.1
Diecutter 3	15,888	7.94	16.4
Corrugator 1	22,568	11.3	20.8
Corrugator 2	8,151	4.08	10.5

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

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

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

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with condition D.2.1, the pneumatic trim collection system consisting of two (2) cyclones (identified as CE05 and CE06) for particulate control shall be in operation and control emissions from the three (3) diecutters and two (2) corrugators at all times that the three (3) diecutters and two (2) corrugators are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description:

(d) One (1) natural gas-fired Kewanee boiler (identified as EU01), with a maximum heat input capacity of 25.11 MMBtu per hour, exhausting at stack ID 01. This unit was installed in 1997.

(e) One (1) natural gas-fired Clayton boiler (identified as EU02), with a maximum heat input capacity of 6.70 MMBtu per hour, exhausting at stack ID 002. This unit was installed in 2001.

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

Emission Limitations and Standards

D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the Kewanee boiler described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.3.2 Particulate [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4(a), the PM emissions from the 25.11 MMBtu per hour Kewanee boiler (identified as EU01) which was existing and in operation after September 21, 1983 shall be limited to 0.47 pounds per MMBtu heat input.

(b) Pursuant to 326 IAC 6-2-4(a), the PM emissions from the 6.70 MMBtu per hour Clayton boiler (identified as EU02) which was existing and in operation after September 21, 1983 shall be limited to 0.44 pounds per MMBtu heat input.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = emission rate limit (lbs per MMBtu)
Q = total source heat input capacity rating in MMBtu per hour (31.8 MMBtu per hour)

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.4 Record Keeping Requirements

(a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial - Commercial - Industrial Steam Generating Units), the Permittee shall maintain daily fuel records for one (1) natural gas-fired Kewanee boiler.

(b) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE 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:	**Inland Display and Packaging Solutions**
Address:	**55740 Currant Road**
City:	**Mishawaka, Indiana 46545**
Phone #:	**(574) 259-7981**
MSOP #:	**145-17168-00547**

I hereby certify that Inland Display and Packaging Solutions is ☐ still in operation.
☐ no longer in operation.

I hereby certify that Inland Display and Packaging Solutions is ☐ in compliance with the requirements of MSOP 141-17168-00547.
☐ not in compliance with the requirements of MSOP 141-17168-00547.

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 PERMI 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:

_____
_____

Issued April 5, 2004

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Inland Display and Packaging Solutions
Source Location:	55740 Currant Road, Mishawaka, Indiana 46545
County:	St. Joseph
SIC Code:	2653
Operation Permit No.:	141-17168-00547
Permit Reviewer:	ERG/SD

On February 13, 2004, the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Inland Display and Packaging Solutions had applied for a Minor Source Operating Permit (MSOP) to operate a stationary corrugated paper and fiberboard manufacturing plant. The notice also stated that IDEM, OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 24, 2004, Inland Display and Packaging Solutions submitted comments on the proposed MSOP. The summary of the comments and responses are shown below. Deleted text will be shown as strikeout and new text will be shown as bold. The Table of Contents has been updated as necessary.

Comment 1:

The source requested a change in the general description of the source under Condition A.1 of the MSOP from a "corrugated paper and fiberboard manufacturing plant" to a "conversion of kraft paper into corrugated containers manufacturing plant used in shipping and display of customer products."

Response to Comment 1:

Condition A.1 has been changed as shown below:

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

The Permittee owns and operates a ~~corrugated paper and fiberboard manufacturing plant~~ **conversion of kraft paper into corrugated containers manufacturing plant used in shipping and display of customer products**.

Comment 2:

The source requested Condition D.1.2 requiring a Preventive Maintenance Plan (PMP) for the flexographic printing presses and gluing operation should be deleted because a malfunction of the equipment would not cause an increase in emissions. A malfunction during the operation of

flexographic printing presses and gluing operation would result in a decrease in equipment production rates and a corresponding decrease in emissions.

Response to Comment 2:

The purpose of a PMP is to ensure that equipment functions properly and that malfunctions that would cause increased emissions are avoided. Since the flexographic printing presses and the gluing operation are not subject to any applicable requirements, a PMP does not provide additional assurance that the source is in compliance. Condition D.1.2 was deleted from the permit as shown below. For clarification purposes, Condition D.1.4(b) that required the Permittee to maintain records of any additional inspections as described by the PMP was deleted.

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

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.~~

D.1.~~3~~**2** Volatile Organic Compounds (VOC)

D.1.4**3** Record Keeping Requirements

. . . . .

~~(b) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

(~~c~~**b**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 3:

The source requested Condition D.2.2 requiring a Preventive Maintenance Plan (PMP) for the two (2) pneumatic trim collection systems, one (1) corn starch handling & storage silo, and the associated integral controls should be deleted because the malfunction of the integral controls would back-up the collection system and result in shut down of the processes. A malfunction of the controls would not result in particulate emissions because the material collected is in bulk and not particulate. The source also requested Condition D.2.4 requiring Visible Emission Notations, Condition D.2.5 requiring Parametric Monitoring, Condition D.2.6 requiring Cyclone Inspections, and Condition D.2.7 requiring Cyclone Failure Detection be deleted from the permit because the actual PM10 emissions from the entire source are less than 25 tons per year.

Response to Comment 3:

The source has two (2) cyclones that are integral and the actual PM10 emissions from the entire source are equal to 1.38 tons per year. A PMP does not provide additional assurance that the source is in compliance with the applicable standards and emission limitations. Therefore, Condition D.2.2 was deleted from the permit. Also, Condition D.2.4 (Visible Emission Notations), D.2.5 (Parametric Monitoring), D.2.6 (Cyclone Inspections) and Condition D.2.8 that required the Permittee to maintain records to document compliance with the above conditions were deleted from the permit. The changes are shown below. No change was made to Condition D.2.7 (Cyclone Failure Detection) because this condition is mandatory for operations with a cyclone.

~~D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and its control devices.~~

D.2.~~3~~**2** Particulate Control

~~D.2.4 Visible Emissions Notations~~

~~(a) Visible emission notations of the two (2) cyclones (identified as CE05 and CE06) stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.~~

~~D.2.5 Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across each cyclone used in conjunction with the three (3) diecutters and two (2) corrugators, at least once per shift when the three (3) diecutters and two (2) corrugators are in operation. When for any one reading, the pressure drop across each cyclone is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

~~D.2.6 Cyclone Inspections~~

~~An inspection shall be performed each calendar quarter of the two (2) cyclones controlling the three (3) diecutters and two (2) corrugators.~~

D.2.~~7~~**3** Cyclone Failure Detection

~~**Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**~~

~~D.2.8 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the two (2) cyclones stack exhaust once per shift.~~

~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.~~

~~(c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.~~

~~(d) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Comment 4:

The source requested Condition C.10 requiring a Pressure Gauge and Other Instrument Specifications be deleted because this condition is applicable to operations with baghouses and not cyclones.

Response to Comment 4:

Condition C.10 was incorrectly included in the Minor Source Operating Permit and has been deleted. The remaining conditions were renumbered accordingly.

~~C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

~~(a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~

~~(b) Whenever a condition in this permit requires the measurement of a (temperature or flow rate), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~

~~(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

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

C.~~11~~**10** Compliance Response Plan - Preparation and Implementation

C.~~12~~**11** Malfunctions Report [326 IAC 1-6-2]

C.~~13~~**12** Emission Statement [326 IAC 2-6]

C.~~14~~**13** General Record Keeping Requirements [326 IAC 2-6.1-5]

C.~~15~~**14** General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

Comment 5:

The source requested Condition D.2.3 requiring Particulate Control be deleted because the two (2) integral cyclones are pneumatic conveying devices and not control equipment. The system uses an air pump to discharge the product into a collection system where the product is baled for sale to a paper broker. Thus the material is not a waste product but a byproduct, which cannot be classified as particulate.

Response to Comment 5:

The integral cyclones used in conjunction with the two (2) pneumatic trim collection systems and one (1) corn starch handling & storage silo must function at all times when the two (2) pneumatic trim collection systems and one (1) corn starch handling & storage silo are in operation. Therefore no change was made to Condition D.2.3.

Comment 6:

The Permittee also requested the following changes:

(1) To delete potential to emit of Isopropanol (CAS No.: 67-63-1) on page 5 of 9 in Appendix A of the Technical Support Document (TSD) because Isopropanol is not listed as a hazardous air pollutant (HAP). Therefore, it should not be counted toward the potential to emit of combination of HAPs.

(2) To revise the potential to emit methodology for VOC from the flexographic printing presses because the current methodology exaggerated the emissions.

(3) To correct the public notice letter to indicate that the potential to emit of PM10 from the entire source was equal to 1.94 tons per year and not 67.4 tons per year.

(4) To correct the header on page 8 of 9 in Appendix A of the Technical Support Document (TSD) from “VOC emissions from Gluing Operation” to “PM and PM10 emissions from Trim Collection System” to reflect the correct emission units.

Response to Comment 6:

The potential to emit of Isopropanol was incorrectly included in the Appendix. The methodology to calculate the potential to emit of VOC from the flexographic printing presses were based on the data submitted by the source and were verified by the source contact on December 16, 2003. IDEM, OAQ agrees that the potential to emit of PM10 on the public notice letter and the header of page 8 of 9 in Appendix A of the TSD are incorrect. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, no changes have been made to the Appendix or the TSD because the IDEM, OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

Upon further review, the IDEM, OAQ has decided to make the following revisions to the permit

1. Condition D.1.1 (b) had a repeated paragraph which has been deleted as shown below.

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-7] [40 CFR 63, Subpart KK]

. . . . .

(b) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of any combination of HAPs is less than twenty-five (25) tons per year from the entire source. Any change or modification which would increase the potential to emit of a single HAP equal to or greater than ten (10) tons per year, and the potential to emit of any combination of HAPs equal to or greater than twenty-five (25) tons per year must receive prior approval from IDEM, OAQ. ~~Any change or modification which would increase the potential to emit of a single HAP equal to or greater than ten (10) tons per year, and the potential to emit of any combination of HAPs equal to or greater than twenty-five (25) tons per year must receive prior approval from IDEM, OAQ.~~

2. For counties designated as secondary non-attainment, the opacity is thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. Therefore, Condition C.3 (Opacity) was corrected to reflect the correct opacity percent as shown below.

C.3 Opacity [326 IAC 5-1]

(a) Opacity shall not exceed an average of ~~forty~~ **thirty** percent ~~(40%)~~ **(30%)** in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

3. A model update on Emission Statement [326 IAC 2-6) as described in Condition C.13 has been incorporated as shown below.

C.~~13~~**12** 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 regulated pollutants (as defined by 326 IAC 2-7-1(32) "Regulated pollutant, which is used only for purposes of Section 19 of this rule") 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:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~(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, 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.~~

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

(1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

**Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

(b) The 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, on or before the date it is due.

Issued April 5, 2004

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Inland Display and Packaging Solutions
Source Location:	55740 Currant Road, Mishawaka, Indiana 46545
County:	St. Joseph
SIC Code:	2653
Operation Permit No.:	141-17168-00547
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Inland Display and Packaging Solutions relating to the operation of a corrugated paper and fiberboard manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source does not consist of any permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

(a) Printing Operations (identified as EU04) consisting of:

(1) One (1) flexographic printing press (identified as press ID 121), printing corrugated paper and fiberboard at a maximum line speed of 116 feet per minute. This unit was constructed in 1982.

(2) One (1) flexographic printing press (identified as press ID 132), printing corrugated paper and fiberboard at a maximum line speed of 133 feet per minute. This facility was constructed in 1988.

(3) One (1) flexographic printing press (identified as press ID 143), printing corrugated paper and fiberboard at a maximum line speed of 131feet per minute. This facility was constructed in 1998.

(4) One (1) flexographic printing press (identified as press ID 145), printing corrugated paper and fiberboard at a maximum line speed of 82.6 feet per minute. This facility was constructed in 1998.

(5) One (1) flexographic printing press (identified as press ID 128), printing corrugated paper and fiberboard at a maximum line speed of 27.7 feet per minute. This facility was constructed in 2000.

(6) One (1) flexographic printing press (identified as press ID 134), printing corrugated paper and fiberboard at a maximum line speed of 133 feet per minute. This facility was constructed in 2001.

(7) One (1) flexographic printing press (identified as press ID 129), printing corrugated paper and fiberboard at a maximum line speed of 58.5 feet per minute. This facility was constructed in 2003.

(b) Two (2) pneumatic trim collection systems (identified as EU05 and EU06) used to collect scrap cardboard pieces from the two (2) corrugators and three (3) diecutters. The pneumatic trim collection system uses two (2) cyclones (identified as CE05 and CE06), which are integral to the collection system. EU05 was constructed in 1997 and EU06 was constructed in 2001.

(1) One (1) diecutter (identified as DC1), with a maximum throughput rate of 22,450 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(2) One (1) diecutter (identified as DC2), with a maximum throughput rate of 16,881 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(3) One (1) diecutter (identified as DC3), with a maximum throughput rate of 15,888 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(4) One (1) corrugator (identified as CO1), with a maximum throughput rate of 22,568 pounds per hour and connected to the pneumatic trim collection system (identified as EU05).

(5) One (1) corrugator (identified as CO2), with a maximum throughput rate of 8,151 pounds per hour and connected to the pneumatic trim collection system (identified as EU06).

(c) One (1) corn starch handling and storage silo (identified as EU03), with a maximum capacity of 100,000 pounds, using a baghouse (identified as BH03) as control, and exhausting at stack ID 03. This unit was installed in 1997.

(d) One (1) natural gas-fired Kewanee boiler (identified as EU01), with a maximum heat input capacity of 25.11 MMBtu per hour, exhausting at stack ID 01. This unit was installed in 1997.

(e) One (1) natural gas-fired Clayton boiler (identified as EU02), with a maximum heat input capacity of 6.70 MMBtu per hour, exhausting at stack ID 002. This unit was installed in 2001.

(f) One (1) gluing process, with a maximum usage rate of 12.4 pounds per hour, applied using a flowcoater. This unit was installed in 2002.

Existing Approvals

The source does not have any previous approvals.

Air Pollution Control Justification as an Integral Part of the Process

(a) The company has submitted the following justification such that the two (2) cyclones (identified as CE05 and CE06) be considered as an integral part of the trim collection systems (identified as EU05 and EU06):

The intended purpose of the two (2) cyclones is to pull the paper trim material away from the corrugator and diecutters and ship it off-site. The cyclones are a pneumatic conveying device for the transfer of paper trim material to a central collection point for baling. The bales of paper trim are sold by the source and delivered to paper brokers. Because the paper trim is sold, the trim is considered by the source as a product, and not a waste. In 2001, the total paper trim byproduct recovered and sold to paper brokers by the source was equal to 9,200,753 pounds, which generated revenue of $252,700. Therefore, the cyclones result in significant positive net economic effect on the source.

IDEM, OAQ has evaluated the justifications and agreed that two (2) cyclones will be considered as an integral part of the pneumatic trim collection systems. Therefore, the permitting level will be determined using the potential to emit after the two (2) cyclones. Operating conditions in the proposed permit will specify that these cyclones shall operate at all times when the pneumatic trim collection systems are in operation.

(b) The company has submitted the following justification such that the baghouse (identified as BH03) be considered as an intergral part of the corn starch silo (identified as EU03):

The starch silo baghouse acts to recover starch during the silo operation and return it to the silo for re-use. The baghouse cycles approximately every 15 minutes to “shake out” the recovered starch. The starch is conveyed directly to the starch silo during the silo filling by the starch vendor truck. It does not pass through the bag filter prior to entering the silo.

IDEM, OAQ has evaluated the justifications and determined that the baghouse (identified as BH03) will not be considered as an integral part of the corn starch handling and storage silo. Therefore, the permitting level will be determined using the potential to emit before the baghouse.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and opeated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled “Unpermitted Emission Units and Pollution Control Equipment”.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{o}F)
001	Boiler 1	36	2.0	10,000	500
002	Boiler 2	25	2.0	2,500	500
003	Starch Silo Baghouse	46	0.28	Passive	Ambient

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{o}F)
005	Cyclone CE05	50	3.19	8,800	Ambient
006	Cyclone CE06	40	0.80	8,800	Ambient

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.

An application for the purposes of this review was received on April 15, 2003, with additional information received on October 30, 2003, December 2, 2003, and December 17, 2003.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 9).

Potential to Emit of the 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, inclulding 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	1.94
PM10	1.94
SO_2	0.08
VOC	82.8
CO	11.7
NO_x	13.9

HAPs	Potential to Emit (tons/year)
Gylcol Ether	6.01
Isopropanol	5.38
Total	11.4

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not in 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.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM10	Attainment
SO_2	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. St. Joseph County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) St. Joseph County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 or 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 Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	1.94
PM10	1.94
SO_2	0.08
VOC	82.8
CO	11.7

NO_x	13.9

Pollutant	Emissions (tons/year)
Single HAP	6.01
Combination HAPs	11.4

*Glycol Ether

(a) This existing source is not a major stationary source because no attainment regulated 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) These emissions were based on potential to emit calculations for this source as shown in Appendix A.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is 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 is the first air approval issued to this source.

Federal Rule Applicability

(a) The Kewanee boiler (identified as EU01) is subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because this boiler was constructed after June 9, 1989 and has a heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, the Kewanee boiler is subject to only the reporting requirements in 40 CFR 60.48(c), because it is a natural gas-fired boiler. As per the reporting requirements, the source must maintain daily records of the amount of natural gas combusted. If the source desires to change the timing of the recording of the fuel combusted from daily recording to monthly recording, then the source must send in this request to the following address:

George Czerniak
c/o United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17 J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

This request should reference the NSPS requirement.

(b) The Clayton boiler (identified as EU02), although constructed after the June 9, 1989 applicability date for this rule, is not subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because it has a heat input capacity less than 10 MMBtu per hour.

(c) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing (326 IAC 12), because this NSPS applies only to rotogravure printing presses. Inland Display and Packing Solutions uses only flexographic presses at this plant.

There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 20-18-1), because this source is not a major source of hazardous air pollutants (HAPs).

(e) This source is not subject to the requirement of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and other Web Coating, because this source is not a major source of HAPs.

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR 61 (326 IAC 14) and 40 CFR Part 63) applicable to this source.

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 and NOx and is located in St. Joseph County. Pursuant to this rule, the Permittee must annually submit an emission statement for the source. The annual statement must be received by April 15 or 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 2-2 (Prevention of Significant Deterioration PSD))

Inland Display and Packaging Solutions was constructed in 1982 and is not in one (1) of the twenty-eight (28) source categories. At the time the source was constructed, the potential to emit of all criteria pollutants was less than 250 tons per year. The source was modified in 1988, 1998, and 2000 to add three (3) flexographic printing presses; in 1997 to add one corn starch silo, one (1) Kewanee boiler, and one (1) trim collection system (identified as EU05); in 2001 to add one (1) flexographic printing press, one (1) Clayton boiler, and one (1) trim collection system (identified as EU06); and in 2002 to add one (1) gluing process. After each of these modifications, the potential to emit of each criteria pollutant from the entire source remained less than 250 tons per year. Therefore, the source is a minor source under PSD and is not subject to the requirements of 326 IAC 2-2.

326 IAC 2-7 (Part 70 Permit Program)

The source is not subject to the requirements of 326 IAC 2-7 (Part 70 Permit Program) because:

(a) The potential to emit VOC from the entire source is less than one hundred (100) tons per year. Any change or modification which would increase the potential to emit of VOC equal to or greater than one hundred (100) tons per year must receive prior approval from IDEM, OAQ.

(b) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of any combination of HAPs is less than twenty-five (25) tons per year from the entire source. Any change or modification which would increase the potential to emit of a single HAP equal to or greater than ten (10)

tons per year, and the potential to emit of any combination of HAPs equal to or greater than twenty-five (25) tons per year must receive prior approval from IDEM, OAQ.

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 the 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.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this corrugated paper and fiberboard manufacturing plant has potential to emit of HAP less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Seven (7) Flexographic Printing Presses

326 IAC 8-5-5 (Graphic Parts Operation)

Although constructed after November 1, 1980, each of the seven (7) flexographic printing presses has potential emissions of VOC less than twenty five (25) tons per year. Therefore, these printing presses are not subject to the provisions of 326 IAC 8-5-5.

State Rule Applicability - Two (2) Natural Gas Fired Boilers

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

This source is not subject to the requirements of 326 IAC 6-1-2 because it does not have either a potential to emit of particulate matter (PM) greater than one hundred (100) tons per year or actual emissions of particulate matter (PM) greater than ten (10) tons per year.

326 IAC 6-2-4(a) (Particulate Emissions Limitations for Sources of Indirect Heating)

(a) Pursuant to 326 IAC 6-2-4(a), the PM emissions from the 25.11 MMBtu per hour Kewanee boiler (identified as EU01) which was existing and in operation after September 21, 1983 shall be limited to 0.47 pounds per MMBtu heat input.

(b) Pursuant to 326 IAC 6-2-4(a), the PM emissions from the 6.70 MMBtu per hour Clayton boiler (identified as EU02) which was existing and in operation after September 21, 1983 shall be limited to 0.44 pounds per MMBtu heat input.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = emission rate limit (lbs per MMBtu)
Q = total source heat input capacity rating in MMBtu per hour

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The requirements of 326 IAC 7-1.1 (Sulfur Dioxide ($SO_{2)}$ Emissions Limitations) are not applicable to the two (2) natural gas-fired boilers because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year.

State Rule Applicability - Diecutters, Corrugators, Starch Silo

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

This source is not subject to the requirements of 326 IAC 6-1-2 because it does not have either a potential to emit of particulate matter (PM) greater than one hundred (100) tons per year or actual emissions of particulate matter (PM) greater than ten (10) tons per year.

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

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes), the particulate emissions shall not exceed the pounds per hour emission limit as shown below:

Emission Units	Process Weight (lb per hour)	Process Weight (ton per hour)	Particulate Emission Limit (lb per hour)
Corn Starch Silo	732	0.37	2.09
Diecutter 1	22,450	11.2	20.7
Diecutter 2	16,881	8.44	17.1
Diecutter 3	15,888	7.94	16.4
Corrugator 1	22,568	11.3	20.8
Corrugator 2	8,151	4.08	10.5

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

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

$$E = 4.10\ P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The two (2) cyclones (identified as CE05 and CE06) shall be in operation at all times the diecutters and corrugators are in operation, in order to comply with this rule.

Based on the potential to emit calculations provided in Appendix A, the corn starch silo is in compliance with this rule.

State Rule Applicability - Gluing Process

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

Although constructed after January 1, 1980, the gluing process facility is not subject to 326 IAC 8-1-6 because the potential VOC emissions from this operation are less than twenty-five (25) tons per year.

Conclusion

The operation of this corrugated paper and fiberboard manufacturing plant shall be subject to the conditions of the Minor Source Operating Permit 141-17168-00547.

Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Natural Gas-Fired Boilers

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

Total Heat Input Capacity MMBtu/hour		Potential Throughput MMCF/year
31.8	(2 Units Only)	279

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	1.06	1.06	0.08	13.9	0.77	11.7

* PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
** Emission factors for NOx (Uncontrolled) = 100 lb/MMCF.

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

METHODOLOGY
Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Natural Gas-Fired Boilers

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	2.93E-04	1.67E-04	1.04E-02	2.51E-01	4.74E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	6.97E-05	1.53E-04	1.95E-04	5.29E-05	2.93E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
PM/PM10 Emissions
From One (1) Corn Starch Silo (Capacity of 100,000 lbs)

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

POTENTIAL TO EMIT PM/PM10

Maximum Throughput Rate (lbs/hour)	732
Maximum Holding Capacity (ton/year)	3204
* Emission Factor (lb/ton)	0.0014
Potential To Emit PM/PM10 After Control (tons/year)	0.0022
** Control Efficiency	99%
Potential To Emit PM/PM10 Before Control (tons/year)	0.22

Assume all PM emissions are equal to PM10.
*Emission factor is from AP-42 Corn Wet Milling, Table 9.9.7-1 for starch storage bins (SCC 3-02-014-07).
** Control =Baghouse

METHODOLOGY
PTE PM/PM10 after control (tons/year) = Maximum holding capacity (tons/year) * Emission factor (lbs/ton) * 1ton/2000 lbs
PTE PM/PM10 before control (tons/year) = Maximum holding capacity (tons/year) * Emission factor (lbs/ton) * 1ton/2000 lbs * 1/(1 - Control Efficiency %)

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Appendix A: Emissions Calculations
VOC Emissions
From Seven (7) Flexographic Printing Presses

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

Press I.D.	Max. Line Speed (ft/min)	Max. Print Width (inches)	Max. Throughput ($MMin^2$/year)
121	116	130	94703
132	133	85.0	71303
134	133	80.0	67109
126	58.5	184	67833
128	27.7	103	17963
143	131	115	95199
145	82.6	66.0	34384

Press I.D	Max. Coverage ($lbs/MMin^2$)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
Press 121/Ink	10.0	3.03%	100%	14.3
Press 132/Ink	10.0	3.0%	100%	10.8
Press 134/Ink	10.0	3.03%	100%	10.2
Press 126/Ink	10.0	3.03%	100%	10.3
Press 128/Ink	10.0	3.03%	100%	2.72
Press 143/Ink	10.0	3.03%	100%	14.4
Press 145/Ink	10.0	3.03%	100%	5.21
			TOTAL PTE of VOC (tons/year) =	**67.9**

Note: Potential to emit calculations are based on operational limits and worst case inks used at the source.

METHODOLOGY
Maximum throughput ($MMin^2$/year) = Maximum line speed (ft/minute) * 12 inches/ft * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year * $1/10^b$ MM
PTE of VOC (tons/year) = Maximum Coverage ($lbs/MMin^2$) * Weight % volatiles * Flash off % * Maximum throughput ($MMin^2$/year) * 1 ton/ 2000 lbs

Appendix A: Emissions Calculations
HAP Emissions
From Seven (7) Flexographic Printing Presses

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

Emission Unit	Max. Coverage (lbs/MMin^2)	Flash Off (%)	Max. Throughput (MMin^2/year)	Potential To Emit			
				Glycol Ethers		Isopropanol	
				% weight	(tons/year)	% weight	(tons/year)
121 Ink/Color Resolution	10.0	100%	94,703	0.268%	1.27	0.24%	1.14
132 Ink/Color Resolution	10.0	100%	71,303	0.268%	0.96	0.24%	0.86
134 Ink/Color Resolution	10.0	100%	67,109	0.268%	0.90	0.24%	0.81
126 Ink/Color Resolution	10.0	100%	67,833	0.27%	0.91	0.24%	0.81
128 Ink/Color Resolution	10.0	100%	17,963	0.27%	0.24	0.24%	0.22
143 Ink/Color Resolution	10.0	100%	95,199	0.268%	1.28	0.24%	1.14
145 Ink/Color Resolution	10.0	100%	34,384	0.27%	0.46	0.24%	0.41
					6.01		**5.38**

Highest Single HAP (tons/year) = 6.01
Combination of HAPs (tons/year) = 11.4

Note: PTE of HAP are based on worst case inks used at the source.

METHODOLOGY
Maximum throughput (MMin^2/year) = Maximum line speed (ft/minute) * 12 inches/ft * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year *1/10^6 MM
PTE of HAPs (tons/year) = Maximum coverage (lbs/MMin^2) * Weight % HAP * Flash off %* Maximum throughput (Mmin^2/year) * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC Emissions
From Gluing Operation

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

Emission Unit	Max. Usage Rate (lbs/hour)	Weight % Volatile	PTE of VOC (lb/hour)	PTE of VOC (ton/year)
* Gluing	12.4	25%	3.11	13.6
TOTAL				**13.6**

* The glue is applied using a flowcoater.

METHODOLOGY
PTE of VOC (lb/hour) = Maximum usage rate (lbs/hour) * Weight % Volatile
PTE of VOC (tons/year) =Maximum usage rate (lbs/hour) * Weight % Volatile * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC Emissions
From Laminator Operation

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

Emission Unit	Maximum Usage Rate (lbs/hour)	Weight % Volatile	PTE of VOC (lb/hour)	PTE of VOC (ton/year)
Laminator	1.15	10%	0.12	0.50
TOTAL				**0.50**

METHODOLOGY
PTE of VOC (lb/hour) = Maximum usage rate (lbs/hour) * Weight % Volatile
PTE of VOC (tons/year) =Maximum usage rate (lbsl/hour) * Weight % Volatile * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC Emissions
From Gluing Operation

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

TRIM COLLECTION SYSTEM No. 1 **POTENTIAL TO EMIT PM/PM10**

		After Control (ton/year)	Before Control (ton/year)
* Particulate Control Equipment = Cyclone			
Outlet Grain Loading (grains/acf) =	0.001	0.33	33.0
Air Flow Rate (acf/minute) =	8800		
Control Efficiency (%) =	99%		

TRIM COLLECTION SYSTEM No. 2 **POTENTIAL TO EMIT PM/PM10**

		After Control (ton/year)	Before Control (ton/year)
* Particulate Control Equipment = Cyclone			
Outlet Grain Loading (grains/acf) =	0.001	0.33	33.0
Air Flow Rate (acf/minute) =	8800		
Control Efficiency (%) =	99%		
	TOTAL		**66.1**

* Assume all PM emissions are equal to PM10.

METHODOLOGY
PTE of PM/PM10 After Control (tons/year) = Outlet grain loading (grain/acf) * Air Flow Rate (acf/minute) * 60 minutes/hour * 1 lb/ 7000 grains * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 Before Control (tons/year) = PTE of PM/PM10 after control (tons/year) * 1/(1- Control Efficiency %)

Appendix A: Emissions Calculations
Summary

Company Name: Inland Display and Packaging Solutions
Address: 55740 Currant Road, Mishawaka, Indiana 46545
Permit: 141-17168
Plt ID: 141-00547
Reviewer: ERG/SD
Date: December 03, 2003

POTENTIAL TO EMIT OF CRITERIA POLLUTANTS IN TONS PER YEAR

Emission Units	PM	PM10	SO_2	NO_x	VOC	CO	* Single Highest HAP	Combination of HAPs
Boilers	1.06	1.06	0.08	13.9	0.77	11.70		
Silo	0.22	0.22						
Presses					67.9		6.01	11.4
Gluing					13.6			
Laminator					0.50			
Trim Waste	0.7	0.7						
Total	1.94	1.94	0.1	13.9	82.8	11.7	6.01	11.4

* Glycol Ether