



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 24, 2006

RE: Smurfit-Stone Container Enterprises, Inc. / 035-17610-00009

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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100 North Senate Avenue  
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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

Smurfit-Stone Container Enterprises, Inc.  
301 South Butterfield Road  
Muncie, Indiana 47303

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 035-17610-00009	
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: January 24, 2006  Expiration Date: January 24, 2011

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary paper and boxboard folding and printing source.

Responsible Official:	General Manager
Source Address:	301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address:	301 South Butterfield Road, Muncie, Indiana 47303
General Source Phone Number:	765 - 741 - 4263
SIC Code:	2657
County Location:	Delaware
Source Location Status:	Basic nonattainment for 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, identified as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 700 feet of cartons per minute.
- (b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press identified as EU-52, installed on June 15, 1980, equipped with a film lamination unit installed in September 2001, an electron beam (EB) curing unit installed in June 2000, as well as a thermal oxidizer, identified as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 800 feet of cartons per minute.
- (c) One (1) water-based three (3) station, forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, identified as EU-31, exhausted through Stack 5, installed in 1968, capacity: 400 feet of cartons per minute.
- (d) Two (2) cyclone scrap separators, identified as EU-C1 and EU-C3, installed in 1979, exhausted through Stacks 6 and 8, capacity: 1 ton of carton scrap per hour, each.
- (e) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons of solvent consumption per day.
- (f) Two (2) storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, capacity: 15,000 gallons of solvent, each.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T 035-17610-00009, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as

Smurfit-Stone Container Enterprises, Inc.  
Muncie, Indiana  
Permit Reviewer: FPC/MES

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defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the

permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13** Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T 035-17610-00009 and issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) 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  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (e) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 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 any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (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 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 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  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" 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 [326 IAC 2-7-6(1)]**

#### **C.7 Performance Testing [326 IAC 3-6]**

- (a) 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  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

**C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 29, 1998.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (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  
Indianapolis, Indiana 46204-2251

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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]  
[326 IAC 2-3]

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- (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 within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project;
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project;
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and 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  
Indianapolis, Indiana 46204-2251
- (c) 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

- (g) The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C-General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]: Printing Presses and Separators**

- (a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, identified as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 700 feet of cartons per minute.
- (b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press, identified as EU-52, installed on June 15, 1980, equipped with a film lamination unit installed in September 2001, an electron beam (EB) curing unit installed in June 2000, as well as a thermal oxidizer, identified as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 800 feet of cartons per minute.
- (c) One (1) water-based three (3) station, forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, identified as EU-31, exhausted through Stack 5, installed in 1968, capacity: 400 feet of cartons per minute.
- (d) Two (2) cyclone scrap separators, identified as EU-C1 and EU-C3, installed in 1979, exhausted through Stacks 6 and 8, capacity: 1 ton of carton scrap per hour, each.

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]**

- (a) Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the Permittee employing solvent-containing ink shall not cause, allow, or permit the operation of the solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press, identified as EU-52, unless:
  - (1) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
  - (2) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material;
  - (3) the Permittee installs and operates:
    - (A) a carbon adsorption system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight;
    - (B) an incineration system that oxidizes at least ninety percent (90%) of the non-methane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water; or
    - (C) an alternative volatile organic compound emission reduction system demonstrated to have at least a ninety percent (90%) reduction efficiency, measured across the control system, and has been approved by the commissioner; or
- (b) The thermal oxidizer, identified as EU-52-I, shall operate at all times that the in-line gravure press, identified as EU-52, is in operation and the inks and coatings being applied do not

comply with (a)(1) or (a)(2).

- (c) A capture system must be used in conjunction with the emission control systems specified in (a)(3). The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes

**D.1.2 PSD Minor Limit [326 IAC 2-2]**

The input VOC to the in-line gravure press, identified as EU-52, from compliant inks and coatings and the input VOC to the in-line gravure press, identified as EU-52, from non-compliant inks and coatings and the usage of cleanup solvents shall be limited by an amount, as shown by the following equation, to prevent the VOC emissions from these processes being greater than two hundred and fifty (250) tons per year:

- (a)  $(\text{VOC from solvent usage}) + (\text{input VOC from compliant inks and coatings}) + [\text{input VOC from non-compliant inks and coatings} \times (100 - \% \text{control efficiency})] < 250 \text{ tons}/12 \text{ consecutive months}$
- (b) This limitation is based upon the use of a thermal oxidizer with an overall control efficiency of at least sixty-five percent (65%) or as determined by the most recent stack test.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the in-line gravure press, identified as EU-52, and its control device, EU-52-I.

**Compliance Determination Requirements**

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

Compliance with the VOC content and usage limitations contained in Condition D.1.2 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

**D.1.5 VOC Emissions**

Compliance with Condition D.1.2 shall be demonstrated within thirty (30) days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous eleven (11) months total VOC emitted so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \% \text{ overall control efficiency})] + [\text{uncontrolled VOC input}]$$

**D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

By October 2, 2008 in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall conduct a performance test to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) as per Conditions D.1.1 and D.1.2 for the thermal oxidizer, identified as EU-52-I, utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.7 Thermal Oxidizer**

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- (a) When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,265 degrees Fahrenheit or a temperature determined in the latest stack test to achieve ninety percent (90%) reduction.
- (b) When operating, the thermal oxidizer shall also maintain a minimum 3/4 inch (water) negative duct pressure or a duct pressure determined in the latest stack test to achieve an overall control efficiency of sixty-five percent (65%).

#### **D.1.8 Thermal Oxidizer Parametric Monitoring**

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- (a) The thermal oxidizer internal combustion zone (fire box) temperature shall be observed at least once per day when the thermal oxidizer is in operation.
- (b) The Permittee shall determine duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2 as approved by IDEM.
- (c) The duct pressure shall be observed at least once per week when the thermal oxidizer is in operation. When for any one reading, the duct pressure is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1 and/or D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis.
    - (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.
  - (3) The cleanup solvent usage for each day month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain the following records:

- (1) The dates and times of all periods of startup and shutdown of the thermal oxidizer, identified as EU-52-I.
  - (2) The dates and times of all periods when the thermal oxidizer, identified as EU-52-I, is not being used because the press is operating entirely with compliant inks and coatings, or without applying inks and/or coatings.
- (c) To document compliance with Condition D.1.8(a), daily records of the temperature of the thermal oxidizer, identified as EU-52-I, used to demonstrate compliance during the most recent compliant stack test.
  - (d) To document compliance with Condition D.1.8(c), weekly records of the duct pressure of the thermal oxidizer, identified as EU-52-I.
  - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Cleanup/Wash and Insignificant Activities

- (e) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons of solvent consumption per day.

#### Insignificant Activities

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees

Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Smurfit-Stone Container Enterprises, Inc.  
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303  
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303  
Part 70 Permit No.: T 035-17610-00009

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Smurfit-Stone Container Enterprises, Inc.  
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303  
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303  
Part 70 Permit No.: T 035-17610-00009

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/>	This is an emergency as defined in 326 IAC 2-7-1(12)
<input checked="" type="checkbox"/>	The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
<input checked="" type="checkbox"/>	The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Smurfit-Stone Container Enterprises, Inc.  
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303  
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303  
Part 70 Permit No.: T 035-17610-00009  
Facility: Eight (8) station, fifty-five (55) inch wide in-line gravure press identified as EU-52  
Parameter: VOC emissions as determined by the equation below  
Limit: Total of two hundred fifty (250) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

VOC Emissions = (VOC from solvent usage) + (input VOC from compliant inks and coatings) + [input VOC from non-compliant inks and coatings x (100 - %control efficiency)]

YEAR: \_\_\_\_\_

Month	VOC Emissions	VOC Emissions	VOC Emissions
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Smurfit-Stone Container Enterprises, Inc.  
 Source Address: 301 South Butterfield Road, Muncie, Indiana 47303  
 Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303  
 Part 70 Permit No.: T 035-17610-00009

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

Addendum to the  
Technical Support Document for a Part 70 Operating Permit

**Source Name:** Smurfit-Stone Container Enterprises, Inc.  
**Source Location:** 301 South Butterfield Road, Muncie, Indiana 47303  
**County:** Delaware  
**SIC Code:** 2657  
**Operation Permit No.:** T 035-17610-00009  
**Permit Reviewer:** Frank P. Castelli

On September 6, 2005, the Office of Air Quality (OAQ) had a notice published in the Muncie Star Press in Muncie, Indiana, stating that Smurfit-Stone Container Enterprises, Inc. had applied for a Part 70 Operating Permit to operate a paper and boxboard folding and printing source with a regenerative thermal oxidizer for VOC control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

On October 3, 2005, Jack G. Kirkpatrick, Plant Engineer, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

### Comment 1:

Condition D.1.6 Testing Requirements (page 27 of 37): This condition as written requires Smurfit-Stone to perform a destruction efficiency test along with an overall control efficiency test by April 2, 2006 and then every two and a half (2.5) years thereafter. We object to the scope of the required testing. Paragraph (b) "Proposed Stack Tests" at the top of page 14 of the Technical Support Document speaks only of testing every 2 ½ years to demonstrate compliance with the 90% oxidation of non-methane volatile organic compounds required by 326 IAC 8-5-5(c)(3)(B). As the Department knows, testing of overall control efficiency is far more costly than testing to demonstrate oxidizer destruction efficiency. Moreover, the already demonstrated capture efficiency of the existing system is 99.2% so without a major change that would require separate permitting, further testing to demonstrate 65% overall control is not necessary. We therefore request that this condition be revised to only require periodic testing of destruction efficiency. Any other testing should not be required in the permit, but should be left to IDEM's authority to require necessary testing to demonstrate compliance. We also believe that given the demonstrated efficiency of the existing oxidizer and the plant's program to maintain the unit, periodic testing every 2 ½ years is unnecessary. Finally, since the oxidizer was tested in October 2003, and it is already October and adverse weather will soon be coming, we request that the next test not be required any sooner than June 30, 2006. We offer the following language incorporating these suggestions. We believe that this proposed language will provide adequate and cost-effective assurance that we are maintaining compliance on the press controlled by the thermal oxidizer.

"Prior to submitting its application for renewal of this permit, or as otherwise directed by the Commissioner, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform VOC destruction efficiency testing for the thermal oxidizer identified as EU-52-I, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Condition C.8 - Performance Testing. This condition does not limit the Commissioner's authority under 326 IAC 2-1.1-11 to require stack testing at any time to assure compliance with all applicable requirements."

### Response 1:

IDEM OAQ has decided that since an IDEM-approved stack test documented that the capture efficiency of the regenerative thermal oxidizer (RTO) was 99.2% and compliance monitoring continued to demonstrate permanent total enclosure, it is not necessary to retest for the capture system and that the testing of the RTO destruction efficiency will be sufficient.

In addition, IDEM, OAQ has agreed to the request to reduce the frequency of the retest from once every 2.5 years to once every (5) five years. Therefore, the next stack test will be required to be performed prior to October 2, 2008 which is five (5) years after the last valid stack test conducted on October 2, 2003. The reduction of the retest frequency is supported by the latest US EPA guidance for the testing of thermal oxidizers controlling VOC emissions from printing presses.

Therefore, Condition D.1.6 has been revised as follows:

#### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

By **October 2, 2008** ~~April 2, 2006~~ in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall ~~perform VOC destruction efficiency and overall control efficiency testing for the thermal oxidizer, identified as EU-52-I,~~ **conduct a performance test to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) as per Conditions D.1.1 and D.1.2** for the thermal oxidizer, **identified as EU-52-I**, utilizing methods as approved by the Commissioner. ~~This~~ **The destruction efficiency** test shall be repeated at least once every **five (5)** ~~two and a half (2.5)~~ years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Upon further review, the OAQ has decided to make additional changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

### Change 1:

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.10 (Preventive Maintenance Plan) and has amended Condition B.11 (Emergency Provisions). Changes to Condition D.1.9 are shown in Change 9. Changes to Conditions B.10 and B.11 are as follows:

#### B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [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 after issuance of this permit, including the following information on each facility:-
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- ~~(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.
- ~~(e)~~ **(b)** A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d)~~ **(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- ~~(a)~~ An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- ~~(b)~~ An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**Change 2:**

IDEM has clarified the Condition B.20 (Operational Flexibility) as follows:

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

### Change 3:

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements as follows:

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- ~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.~~
- (b) 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 one hundred (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. ~~This condition is not federally enforceable.~~

### Change 4:

Since the requirements of Condition C.6 (Operation of Equipment) have been incorporated in the D Sections, Condition C.6 has been removed from the permit, as follows, and the remainder of Section C has been renumbered accordingly:

#### ~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.~~

### Change 5:

IDEM realizes that the instrument specifications can only be practically applied to analog units, and has therefore clarified Condition C.12 (now C.11) to state that the condition only applies to analog units. IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from Condition C.12 (now C.11) as follows:

#### ~~C.1112 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 pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected normal maximum reading for the normal range 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 voltage or current 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 five percent (2%) of full scale reading.~~
- (c) ~~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.~~
- (d) ~~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.~~
- (e) (b) The Permittee may request **that** the IDEM, OAQ approve the use of a pressure gauge or ~~other an~~ instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other **the** parameters.

#### Change 6:

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The following changes have been made to Condition 15 (now C.14):

#### C.1415 Compliance Response Plan – Preparation, Implementation, Records, and Reports **Response to Excursions or Exceedances** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 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 and the Permittee documents such response in accordance with subsection (e) below, 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~~

Smurfit-Stone Container Enterprises, Inc.  
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- (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) ~~—— When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- (e) ~~—— The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- (f) ~~—— 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.~~
- (a) **Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) **The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than**

those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**Change 7:**

Since the latest IDEM approved stack test for the regenerative thermal oxidizer verified compliance with the 90% VOC reduction efficiency with a stack temperature of 1,265 degrees Fahrenheit, the stack temperature requirement in Condition D.1.7 has been revised from 1,260 to 1,265 degrees Fahrenheit as follows:

**D.1.7 Thermal Oxidizer**

- 
- (a) When operating, the thermal oxidizer shall maintain a minimum operating temperature of **1,265** ~~1,260~~ degrees Fahrenheit or a temperature determined in the latest stack test to achieve ninety percent (90%) reduction.
  - (b) When operating, the thermal oxidizer shall also maintain a minimum 3/4 inch (water) negative duct pressure or a duct pressure determined in the latest stack test to achieve an overall control efficiency of sixty-five percent (65%).

**Change 8:**

Condition D.1.8 has been revised to document that the Permittee shall determine duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and

D.1.2 as approved by IDEM as follows and incorporates other changes discussed above as follows:

D.1.8 Thermal Oxidizer **Parametric** Monitoring

- (a) The thermal oxidizer internal combustion zone (fire box) temperature shall be observed at least once per day when the thermal oxidizer is in operation.
- (b) **The Permittee shall determine duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2 as approved by IDEM.**
- (cb) The duct pressure shall be observed at least once per week when the thermal oxidizer is in operation. **When for any one reading, the duct pressure is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**
- ~~(c) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

**Change 9:**

Conditions D.1.9(d) has been revised to reflect the change in the internal cite in Condition D.1.8 and Condition D.1.9(e) has been deleted as follows:

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1 and/or D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis.
    - (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.
  - (3) The cleanup solvent usage for each day month;
  - (4) The total VOC usage for each month; and

- (5) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain the following records:
  - (1) The dates and times of all periods of startup and shutdown of the thermal oxidizer, identified as EU-52-I.
  - (2) The dates and times of all periods when the thermal oxidizer, identified as EU-52-I, is not being used because the press is operating entirely with compliant inks and coatings, or without applying inks and/or coatings.
- (c) To document compliance with Condition D.1.8(a), daily records of the temperature of the thermal oxidizer, identified as EU-52-I, used to demonstrate compliance during the most recent compliant stack test.
- (d) To document compliance with Condition D.1.8(c), weekly records of the duct pressure of the thermal oxidizer, identified as EU-52-I.
- ~~(e) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (ef) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Change 10:**

The last four digits (2251) have been added to the IDEM, OAQ ZIP code throughout the permit.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Smurfit-Stone Container Enterprises, Inc.</b>
<b>Source Location:</b>	<b>301 South Butterfield Road, Muncie, Indiana 47303</b>
<b>County:</b>	<b>Delaware</b>
<b>SIC Code:</b>	<b>2657</b>
<b>Operation Permit No.:</b>	<b>T 035-5970-00009</b>
<b>Operation Permit Issuance Date:</b>	<b>January 25, 1999</b>
<b>Permit Renewal No.:</b>	<b>T 035-17610-00009</b>
<b>Permit Reviewer:</b>	<b>Frank P. Castelli</b>

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Smurfit-Stone Container Enterprises, Inc. (formerly known as Jefferson Smurfit Corporation (U.S.)) relating to the operation of a paper and boxboard folding and printing source.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, identified as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 700 feet of cartons per minute.
- (b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press identified as EU-52, installed on June 15, 1980, equipped with a film lamination unit installed in September 2001, an electron beam (EB) curing unit installed in June 2000, as well as a thermal oxidizer, identified as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 800 feet of cartons per minute.
- (c) One (1) water-based three (3) station, forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, identified as EU-31, exhausted through Stack 5, installed in 1968, capacity: 400 of cartons feet per minute.
- (d) Two (2) cyclone scrap separators, identified as EU-C1 and EU-C3, installed in 1979, exhausted through Stacks 6 and 8, capacity: 1 ton of carton scrap per hour, each.
- (e) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons of solvent consumption per day.
- (f) Two (2) storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, capacity: 15,000 gallons of solvent, each.

**Unpermitted Emission Units and Pollution Control Equipment**

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

## **New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

There are no proposed emission units during this review process.

## **Emission Units and Pollution Control Equipment Removed**

The following facility has been removed from the source and is not included in the proposed permit:

One (1) cyclone scrap separator, identified as EU-C2, exhausted through Stack 7, installed in 1979, capacity: 1 ton of carton scrap per hour.

## **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total rating of 1.610 million British thermal units per hour, consisting of:
  - (1) Two (2) space heaters, rated at 0.400 million British thermal units per hour each.
  - (2) Three (3) Wise burners, rated at 0.020 million British thermal units per hour each.
  - (3) One (1) GTS oil heater, rated at 0.750 million British thermal units per hour.
- (b) Combustion source flame safety purging on startup.
- (c) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (d) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
  - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) Closed loop heating and cooling systems.
- (f) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

- (g) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (h) Heat exchanger cleaning and repair.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) On-site fire and emergency response training approved by the department.
- (n) Other activities or categories not previously identified:
  - (1) Finish department activities, including seven (7) gluers.
  - (2) One (1) ink mixer.

### Existing Approvals

The source has been operating under the previous Part 70 Operating Permit T 035-5970-00009, issued on January 25, 1999, and the following amendments and modifications:

- (a) SPM 035-11365-00009, issued on April 4, 2000; and
- (b) Reopening 035-13188-00009, issued on November 27, 2001.

Note that Review Requests 035-13558-00009 and 035-14628-00009 were not issued since IDEM, OAQ determined that no action was necessary to be taken on each of these review requests.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this proposed permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined to be no longer applicable; therefore, they were not incorporated into this proposed Part 70 Operating Permit:

#### Condition D.3.1 Record Keeping [326 IAC 12, (40 CFR Part 60.110b, Subpart Kb)]

The two (2) storage tanks EU-ST-1 and EU-ST-2 shall comply with the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb). These tanks are subject to only 40 CFR Part 60.116b, paragraphs (a) and (b) which requires the Permittee to maintain accessible records showing the dimensions of the storage vessel

and an analysis showing the capacity of the storage vessel. Records shall be kept for the life of the storage tanks

Reason not incorporated: This condition has not been incorporated into this renewal since 40 CFR Part 60.110b, Subpart Kb, has been revised and the rule no longer applies to storage vessels with capacities less than seventy-five (75) cubic meters.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 administratively complete Part 70 Operating Permit renewal application for the purposes of this review was received on April 24, 2003. Additional information was received on May 31, 2005.

### **Emission Calculations**

See pages 1 through 3 of Appendix A of this document for detailed emission calculations for the worst case potential VOC emissions from the three (3) printing presses and the natural gas combustion insignificant activities.

- (a) The potential volatile organic compounds emissions from the cleanup and wash tank, identified as EU-WT, are as follows:

Daily S-147 solvent consumption = 4.77 gallons per day  
Solvent density = 7.33 pounds per gallon  
VOC content of solvent = 100% by weight.  
S-147 solvent = 10% xylene and 10% MIBK

Therefore, the potential VOC emissions are:

$$4.77 \text{ gal/day} * 7.33 \text{ lbs/gal} * 365 \text{ days/yr} * 1 \text{ ton}/2,000 \text{ lbs} = 6.38 \text{ tons/yr}$$

- (b) The HAPs from the cleanup and wash tank, identified as EU-WT, are as follows:

S-147 solvent = 10% xylene and 10% MIBK

Therefore, the potential HAPs emissions are:

$$6.38 \text{ tons/yr of VOC} * 10\% \text{ xylene} = 0.638 \text{ tons per year of xylene}$$

$$6.38 \text{ tons/yr of VOC} * 10\% \text{ MIBK} = 0.638 \text{ tons per year of MIBK}$$

Total HAPs = 1.28 tons per year.

- (c) The potential VOC and total HAPs emissions from the two (2) solvent storage tanks, identified as EU-ST-1 and EU-ST-2, were conservatively estimated at 0.500 and 0.250 tons per year, respectively.

**Potential to Emit of the Source**

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

The source was issued a Part 70 Operating Permit on January 25, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential To Emit (tons/yr)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Total HAPs
Two (2) flexographic printing stations & one (1) gravure station, identified as EU-31	-	-	-	184	-	-	0.199
(36) inch wide roll-to-roll gravure press, identified as EU-51	-	-	-	252	-	-	0.272
(55) inch wide in-line gravure press identified as EU-52	-	-	-	9.19	-	-	0.010
Two (2) cyclone scrap separators, identified as EU-C1 and EU-C3	Negligible	Negligible	-	-	-	-	-
One (1) cleanup and wash tank, identified as EU-WT	-	-	-	6.38	-	-	1.28
Two (2) solvent storage tanks, identified as EU-ST-1 and EU-ST-2	-	-	-	0.500	-	-	0.250
Natural gas combustion, including the thermal oxidizer	0.120	0.480	0.038	0.347	5.30	6.31	0.119
Other Insignificant Activities	2.00	1.00	-	1.00	-	-	0.500
<b>Total Emissions</b>	<b>2.12</b>	<b>1.48</b>	<b>0.038</b>	<b>453</b>	<b>5.30</b>	<b>6.31</b>	<b>2.63</b>

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (c) Note a “-“ in the table indicates that the pollutant is not emitted by the emission unit, whereas “negligible” indicates less than 0.1 ton per year emitted.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the actual 2004 emissions supplied by Smurfit-Stone Container Enterprises

<b>Pollutant</b>	<b>Actual Emissions (tons/year)</b>
PM	-
PM <sub>10</sub>	-
SO <sub>2</sub>	-
VOC	157
CO	-
NO <sub>x</sub>	-
HAPs	0.17

**County Attainment Status**

The source is located in Deleware County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-Hour Ozone	attainment
8-Hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Delaware County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) Delaware County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability for the source section.
- (c) Delaware County has been classified as attainment or unclassifiable in Indiana for all remaining 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 - Entire Source section of this document.

#### **Part 70 Operating Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Operating Permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

#### **Federal Rule Applicability**

- (a) Compliance Assurance Monitoring (CAM)
  - (1) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:
    - (A) with the potential to emit before controls equal to or greater than the major source threshold for VOC,
    - (B) that is subject to an emission limitation or standard for VOC, and
    - (C) uses a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this source, specifically the thermal oxidizer, identified as EU-52-I, associated with press EU-52.

- (2) The following compliance assurance monitoring conditions are applicable to the thermal oxidizer control unit, identified as EU-52-I. The thermal oxidizer is not a large pollutant-specific emission unit because the potential to emit VOC from thermal oxidizer, identified as EU-52-I, after control, is less than the major source level of one hundred (100) tons per year.

Parameters to Monitor

- (A) Internal combustion zone (fire box) temperature shall be observed once per day, when the thermal oxidizer is in operation.
- (B) Duct pressure shall be observed at least once per week, when the thermal oxidizer is in operation.

- (3) CAM Justification

Based upon a review of 40 CFR 64 the proposed compliance monitoring for the thermal oxidizer control unit, identified as EU-52-I, satisfies the requirements of 40 CFR 64.

(b) New Source Performance Standards (NSPS)

- (1) The two (2) 15,000 gallon storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, each have a capacity less than seventy-five (75) cubic meters. Therefore, the requirements of 40 CFR 60, Subpart Kb are not included in the proposed permit.
- (2) The requirements of 40 CFR 60, Subpart QQ (Standards of Performance for Graphic Art Industry: Publication Rotogravure Printing), are not included in this permit because the rotogravure printing presses, identified as EU-51 and EU-52, are not publication printing presses and were installed prior to the October 28, 1980 applicability date.
- (3) The requirements of 40 CFR 60, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations), are not included in this permit since the source does not manufacture pressure sensitive tapes or labels.
- (4) The requirements of 40 CFR 60, Subpart FFF (Standards of Performance for Flexible Vinyl Urethane Coating and Printing), are not included in this permit because the rotogravure printing presses, identified as EU-51 and EU-52, do not print or coat flexible vinyl or urethane products, such as vinyl wallpaper or upholstery, and were installed prior to the January 1983 applicability date.

(c) National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning) have not been included in this permit because the cleanup and wash tank, identified as EU-WT, uses a solvent which is not specified in 40 CFR Part 63, Subpart T.
- (2) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart KK (Printing and Publishing) have not been

included in this permit because the HAPs from the entire source are less than ten (10) and twenty-five (25) tons per year for a single and combination of HAPs, respectively.

- (3) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart JJJJ (Paper and Other Web Coating) have not been included in this permit because the HAPs from the entire source are less than ten (10) and twenty-five (25) tons per year for a single and combination of HAPs, respectively.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

Presses, identified as EU-31 and EU-51, were both constructed prior to the PSD applicability date of August 7, 1977. In addition, the total potential to emit VOC from presses EU-31 and EU-51 was greater than one hundred (100) tons per year, but less than two hundred and fifty (250) tons per year as documented in the Technical Support Document for Part 70 Operating Permit, T 035-5970. Therefore, the source which is not one of the twenty-eight (28) listed source categories, was a minor source pursuant to the PSD rules.

Printing press EU-52 was added to this source in June 1980. The potential to emit VOC from press EU-52 was limited to less than two hundred-fifty (250) tons per year but the addition of press EU-52 made the potential to emit VOC from the entire source exceed two hundred-fifty (250) tons per year. Therefore the addition of the press, identified as EU-52, in June 1980 made this source an existing major source pursuant to 326 IAC 2-2 since the potential to emit VOC from this source, which is not one of the twenty-eight (28) listed source categories, exceeded two hundred-fifty (250) tons per year after the June 1980 source modification.

The details of the PSD applicability regarding the addition of the press, identified as EU-52, to this source are explained in the State Rule Applicability section for individual facilities.

#### **326 IAC 2-3 (Emission Offset)**

The potential VOC emissions after controls and limits from the entire source are greater than one hundred (100) tons per year. Therefore, this source is a major source pursuant to 326 IAC 2-3, Emission Offset after the installation of in-line gravure press, identified as EU-52, in 1980.

There have not been any modifications to this source that are subject to the requirements of 326 IAC 2-3.

#### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs))**

The operation of paper and boxboard folding and printing source, constructed prior to July 27, 1997, will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of the combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to the entire source.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement should have been submitted by July 1, 2005 and then

once every three (3) years afterwards. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in 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.

#### State Rule Applicability – Individual Facilities

##### 326 IAC 2-2 (PSD)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), EU-52 installed in June 1980, EU-WT installed in 1991, EU-ST-1 and EU-ST-2 installed in 1993, were each constructed after the PSD applicability date of the August 7, 1977.

(a) EU-52

The VOC emissions from press, EU-52, were limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. This made the addition of this press a minor modification to an existing minor PSD source. From that point on, this source was a major PSD source that did not undergo PSD review.

The input VOC to press, EU-52, from compliant inks and coatings and the input VOC to the press, EU-52, from non-compliant inks and coatings and the usage of cleanup solvents shall be limited by an amount, as shown by the following equation, to prevent the VOC emissions from these processes from being greater than 250 tons per year:

$$(\text{VOC from solvent usage}) + (\text{input VOC from compliant inks and coatings}) + [\text{input VOC from non-compliant inks and coatings} \times (1 - \% \text{ control efficiency})] < 250 \text{ tons per twelve (12) consecutive month period with compliance determined at the end of each month.}$$

This limitation is based upon the use of a thermal oxidizer with an overall control efficiency of at least sixty-five percent (65.0%).

(b) EU-WT

The addition of the cleanup and wash tank, identified as EU-WT, installed in 1991, to the source was a minor PSD modification to an existing major source because the potential VOC emissions were less than the PSD significant level of forty (40) tons per year.

(c) EU-ST-1 and EU-ST-2

The addition of two (2) storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, to the source was a minor PSD modification to an existing major source because the total potential VOC emissions were less than the PSD significant level of forty (40) tons per year.

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

The three (3) printing presses, identified as EU-31, EU-51 and EU-52, as well as the two (2) cyclone scrap separators, identified as EU-C1 and EU-C3, are all exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(b)(14), because the potential to emit PM from each of these facilities is less than five hundred fifty-one thousandths (0.551) pounds per hour.

#### 326 IAC 8-3-2 (Cold Cleaner Operations)

The cleanup and wash tank, identified as EU-WT, installed in 1991, and the insignificant degreasing activities are subject to the requirements of this rule.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cleanup and wash tank, identified as EU-WT, installed in 1991, and the insignificant degreasing activities are subject to the requirements of this rule.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

- (a) The water-based three (3) station, forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, identified as EU-31, and the solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, identified as EU-51, were both constructed prior to the November 1, 1980 applicability date of

this rule pursuant to 326 IAC 8-5-1(1). Therefore, this rule does not apply to either of these facilities, EU-31 or EU-51.

- (b) Since the solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press, identified as EU-52, installed in June 1980 has the potential to emit more than one hundred (100) tons per year of VOC, this rule is applicable. Pursuant to 326 IAC 8-5-5 and SPM 035-11365-00009, issued on April 4, 2000, the thermal oxidizer shall operate at all times that EU-52 is in operation and the inks and coatings being applied do not comply with the VOC content requirements of 326 IAC 8-5-5(c)(1) or (2).
- (c) When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-5-5, the thermal oxidizer shall maintain a minimum ninety (90%) percent destruction efficiency and an overall control efficiency of sixty-five percent (65%). The destruction efficiency of ninety percent (90%) is required by 326 IAC 8-5-5(c)(3)(B). The overall control efficiency of sixty-five percent (65%) is required by 326 IAC 8-5-5(e)(2).

#### 326 IAC 8-6 (Organic solvent emission limitations)

Pursuant to 326 IAC 8-6 (Organic solvent emission limitations), the water-based three (3) station, forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, identified as EU-31, and the solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, identified as EU-51, are not subject to this rule, because these facilities were all constructed prior to the October 7, 1974 applicability date.

The solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press, identified as EU-52, installed in June 1980 is also not subject to this rule since it was installed after January 1, 1980 and is subject to an Article 8 rule, 326 IAC 8-5-5.

#### Testing Requirements

- (a) Past Stack Tests
  - (1) On October 28, 1997, a stack test was performed on the thermal oxidizer controlling the VOC emissions from one (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press, identified as EU-52. This test indicated a VOC destruction efficiency of 99.8% which complies with the 90% VOC destruction requirement specified by 326 IAC 8-5-5.
  - (2) On October 1 and 2, 2003, stack tests were performed on the thermal oxidizer controlling the VOC emissions from one (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press, identified as EU-52. These tests were requested by U.S. EPA.

These tests indicated that the VOC destruction efficiency varied from 96.8% (Method 25) to 99.0% (Method 25A) which complies with the 90% VOC destruction requirement specified by 326 IAC 8-5-5 and contained in the proposed Part 70 Operating Permit Renewal. Given a measured capture efficiency of 99.2%, the overall VOC control efficiency varied from 96.1% (Method 25) to 98.2% (Method 25A) which complies with the overall control efficiency of 65% specified by 326 IAC 8-5-5 and contained in the proposed Part 70 Operating Permit Renewal.

(b) Proposed Stack Tests

Only one (1) of the three (3) presses has a control device. Therefore, stack testing is proposed for this press (the one (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press, identified as EU-52) which has a potential to emit before controls of greater than one hundred (100) tons per year. Since the thermal oxidizer for EU-52 was last tested on October 1 and 2, 2003, the thermal oxidizer controlling the VOC emissions from EU-52 is proposed to be tested by April 2, 2006 which is 2.5 years after the date of the last valid compliance demonstration. This test shall be performed to verify that the thermal oxidizer complies with the VOC destruction efficiency specified by 326 IAC 8-5-5. The compliance testing shall be repeated once every 2.5 years from the date of the last valid compliance demonstration for this thermal oxidizer at a printing press with a potential to emit VOC of greater than one hundred (100) tons per year before controls.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The fifty-five (55) inch wide in-line gravure press, identified as EU-52, equipped with a thermal oxidizer, identified as EU-52-I, has applicable compliance monitoring conditions as specified below:
- (1) When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,260 degrees Fahrenheit or a temperature determined in the latest stack test to achieve ninety percent (90%) reduction. The thermal oxidizer internal combustion zone (fire box) temperature shall be observed at least once per day when the thermal oxidizer is in operation.
  - (2) When operating, the thermal oxidizer shall also maintain a minimum 3/4 inch (water) negative duct pressure or a duct pressure determined in the latest stack test to achieve an overall control efficiency of sixty-five percent (65%). The duct pressure shall be observed at least once per week when the thermal oxidizer is in operation.

The Compliance Response Plan shall be followed whenever a condition exists

which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the thermal oxidizer controlling VOC emissions from press EU-52 must operate properly to ensure compliance with 40 CFR 64, 326 IAC 8-5-5 and 326 IAC 2-7 (Part 70).

- (b) The two (2) cyclone scrap separators, identified as EU-C1 and EU-C3, do not have compliance monitoring requirements. The cyclones are not utilized as control devices, but are used to transport boxboard scrap. The cyclone scrap separators are exempt from the requirements of 326 IAC 6-3-2.

### **Conclusion**

The operation of this paper and boxboard folding and printing source shall be subject to the conditions of this Part 70 Operating Permit T 035-17610-00009.

**Appendix A: Emissions Calculations**  
**VOC From Printing Press Operations**  
**Company Name: Smurfit-Stone Container Enterprises, Inc.**  
**Address City IN Zip: 301 South Butterfield Road, Muncie, Indiana 47303**  
**Part 70: T 035-17610**  
**Plt ID: 035-00009**  
**Reviewer: Frank P. Castelli**  
**Date: April 24, 2003**

**Thermal Oxidizer Control Press 52 Only**

Capture Efficiency 99.2%  
 Destruction Efficiency 98.7%  
 Overall Control 97.9%

THROUGHPUT	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR	Press Type
Press I.D.				
52	800	55	277517	Packaging Gravure
51	700	36	158941	Packaging Gravure
31	400	46	116052	Packaging Flexo/Gravure

Worse Case Ink VOCS	Maximum Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Throughput (MMin <sup>2</sup> /Year)	Potential VOC Emissions Before Control (TONS/YEAR)	Potential VOC Emissions After Control (TONS/YEAR)
Press 52	11.0	28.8%	100.00%	277517	440	9.19
Press 51	11.0	28.8%	100.00%	158941	252	252
Press 31	11.0	28.8%	100.00%	116052	184	184
HAPs						
Total HAPs as % of VOC						
0.108%						
See HAPs note below:						

Total VOC Emissions =	875	TONS/YEAR
Total HAPs	0.945	TONS/YEAR

**METHODOLOGY**

\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds  
 Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year  
 VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year  
 NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.  
 OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.  
 (Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93) )

HAPs Note:

HAPs percentage calculated from actual 2004 emissions supplied by the applicant. Total HAPs emissions were 0.17 tons and total VOC emissions were 156.991 tons  
 0.17 = 0.108%  
 divided by 156.991

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**10 < MM BTU/HR <100**

**Company Name:** Smurfit-Stone Container Enterprises, Inc.  
**Address City IN Zip:** 301 South Butterfield Road, Muncie, Indiana 47303  
**Part 70:** T 035-17610  
**Plt ID:** 035-00009  
**Reviewer:** Frank P. Castelli  
**Date:** April 24, 2003

**Rating**  
**(MMBtu/hr)**

**Thermal Oxidizer (EU-52 I)**  
**Two (2) Dayton Space Heaters @ 0.400 each**  
**Three (3) Wise Burners @ 0.020 each**  
**GTS Oil Heater**

**14.4**  
**126.2**  
**14.4**

Potential Throughput  
MMCF/yr

126.2

	Pollutant						Total
	PM	PM10	SO2	NOx	VOC	CO	
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0	
Potential Emission in tons/yr	0.120	0.480	0.038	6.31	0.347	5.30	

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, and 1-03-006-03  
(SUPPLEMENT D 3/98)  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
See page 3 for HAPs emissions calculations.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions

**Company Name:** Smurfit-Stone Container Enterprises, Inc.  
**Address City IN Zip:** 301 South Butterfield Road, Muncie, Indiana 47303  
**Part 70:** T 035-17610  
**Pit ID:** 035-00009  
**Reviewer:** Frank P. Castelli  
**Date:** 37735

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000133	0.000076	0.004734	0.113608	0.000215

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021
Potential Emission in tons/yr	0.00003	0.00007	0.00009	0.00002	0.00013
					<b>Total</b>
					<b>0.119</b>

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.