



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 4, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Inland Paperboard and Packaging / MSOP 107-17679-00060

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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.

Enclosures
FNPER.dot 9/16/03



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Inland Paperboard and Packaging
801 North Englewood Drive
Crawfordsville, Indiana 47933**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (326 IAC 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 107-17679-00060	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 4, 2004 Expiration Date: June 4, 2009

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a corrugated and solid fiber box manufacturing source.

Authorized Individual:	Inland Paperboard and Packaging
Source Address:	801 North Englewood Drive, Crawfordsville, Indiana 47933
Mailing Address:	801 North Englewood Drive, Crawfordsville, Indiana 47933
General Source Phone:	765-362-4010
SIC Code:	2653
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired boiler, identified as A-57, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 002, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (b) One (1) natural gas-fired boiler, identified as A-58, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 003, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (c) One (1) starch silo, identified as 004, constructed in 1972, equipped with baghouse 004 for particulate control, exhausting to Stack 004, capacity: 100,000 pounds of corn starch.
- (d) One (1) trim waste collection system, identified as 005, constructed in 1972, consisting of a flexo transfer cyclone, exhausting to Stack 005, capacity: 5,449 pounds of trim waste per hour.
- (e) One (1) 99-inch corrugator, identified as C-40, constructed in 1972, equipped with the one (1) trim waste collection system identified as 005, capacity: 1,000 feet per minute and 113,845 pounds of paper per hour.
- (f) One (1) dust collection system used to clean board prior to printing, identified as 006, constructed in 1997, equipped with a baghouse for particulate control, exhausting to Stack 006, throughput: 46,762 pounds of board per hour or 7,320 pounds of dust per year.
- (g) One (1) cornstarch mixing tank, constructed in 1972, capacity: 3,000 gallons of cornstarch.

- (h) Two (2) corn starch storage tanks, identified as Tank 1 and Tank 2, both constructed in 1972, capacity: 3,000 gallons of cornstarch, each.
- (i) One (1) spare tank for cornstarch storage, identified as Spare Tank, constructed in 1990, capacity: 500 gallons of cornstarch.
- (j) One (1) standby #2 fuel tank, constructed in 1998, capacity: 12,000 gallons of fuel.
- (k) One (1) waste water treatment system.
- (l) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 113 inches.
- (m) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 113 inches.
- (n) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 94 inches.
- (o) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 80 inches.
- (p) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.
- (q) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.
- (r) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 110 inches.
- (s) One (1) two-color flexo folder gluer, identified as EG-74, constructed in 1983, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

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

B.5 Modification to Permit [326 IAC 2]

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

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

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

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

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]
[IC13-17-3-2] [IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the 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]

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.

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

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

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

- (b) Whenever a condition in this permit requires the measurement of a (temperature or flow rate), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.11 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 emissions unit 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 re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Boilers

- (a) One (1) natural gas-fired boiler, identified as A-57, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 002, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (b) One (1) natural gas-fired boiler, identified as A-58, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 003, rated at 14.645 million British thermal units per hour and 350 horsepower.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pound per million British thermal units heat input.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the 27.27 million British thermal units per hour oil-fired boiler shall not exceed five tenths (0.5) pound per million British thermal units heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.2 shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide

emissions from the two (2) boilers with a total rating of 29.29 MMBtu per hour, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations from each of the two (2) boilers stack exhaust shall be performed once per shift during normal daylight operations when combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:
 - (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this

permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations from each of the two (2) boilers stack exhaust once per shift.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

- (a) The natural gas boiler certification 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 its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (b) A semi-annual 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 six (6) month period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Miscellaneous Operations

- (c) One (1) starch silo, identified as 004, constructed in 1972, equipped with baghouse 004 for particulate control, exhausting to Stack 004, capacity: 100,000 pounds of corn starch.
- (d) One (1) trim waste collection system, identified as 005, constructed in 1972, consisting of a flexo transfer cyclone, exhausting to Stack 005, capacity: 5,449 pounds of trim waste per hour.
- (e) One (1) 99-inch corrugator, identified as C-40, constructed in 1972, equipped with the one (1) trim waste collection system identified as 005, capacity: 1,000 feet per minute and 113,845 pounds of paper per hour, equipped with:
- (f) One (1) dust collection system used to clean board prior to printing, identified as 006, constructed in 1997, equipped with a baghouse for particulate control, exhausting to Stack 006, throughput: 46,762 pounds of board per hour or 7,320 pounds of dust per year.
- (g) One (1) cornstarch mixing tank, constructed in 1972, capacity: 3,000 gallons of cornstarch.
- (h) Two (2) cornstarch storage tanks, identified as Tank 1 and Tank 2, both constructed in 1972, capacity: 3,000 gallons of cornstarch, each.
- (i) One (1) spare tank for cornstarch storage, identified as Spare Tank, constructed in 1990, capacity: 500 gallons of cornstarch.
- (j) One (1) standby #2 fuel tank, constructed in 1998, capacity: 12,000 gallons of fuel.
- (k) One (1) waste water treatment system.

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

D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) trim waste collection system shall not exceed 45.8 pounds per hour when operating at a process weight rate of 113,845 pounds per hour.

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

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) dust collection system shall not exceed 33.9 pounds per hour when operating at a process weight rate of 46,762 pounds per hour.

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

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

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

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

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

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the flexo transfer cyclone and baghouse for particulate control shall be in operation and control emissions from the one (1) trim waste collection system and the one (1) 99-inch corrugator at all times that these facilities are in operation.

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

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the from the one (1) trim waste collection system and the one (1) 99-inch corrugator stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the one (1) dust collection system, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ,

and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the one (1) 99-inch corrugator. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

D.2.8 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the one (1) trim waste collection system. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections required by this condition shall not be performed in consecutive months.

D.2.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

Record Keeping and Reporting Requirement

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the one (1) trim waste collection system and the one (1) 99-inch corrugator stack exhaust once per shift.

- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.
- (c) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6 and D.2.8.
- (d) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Printing and Gluing Operations

- (l) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 113 inches.
- (m) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 113 inches.
- (n) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 94 inches.
- (o) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 80 inches.
- (p) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.
- (q) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.
- (r) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 110 inches.
- (s) One (1) two-color flexo folder gluer, identified as EG-74, constructed in 1983, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.

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

Emission Limitations and Standards

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from EO-75, EO-93, EG-128, EG-113, EG-114 and EG-74.

Compliance with this limitation shall be determined using the volume weighted average method detailed in Condition D.3.4.

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 or another approved alternative method in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.4 VOC Emissions

Pursuant to 326 IAC 8-1-2(a)(7), when volume weighted averaging of the coatings is used to determine compliance with the limitation set in Condition D.3.1. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A = the volume weighted average in pounds VOC per gallon;
C = the VOC content of the coating in pounds VOC per gallon; and
U = is the usage rate of the coating in gallons per unit, hour, day or other unit of time

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

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) and (4) below. Records maintained for (1) and (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each time frame used to show compliance with Condition D.3.4;
 - (3) The total VOC usage for each time frame used to show compliance with Condition D.3.4; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Inland Paperboard and Packaging
Address:	801 North Englewood Drive
City:	Crawfordsville, Indiana
Phone #:	317-879-4227
MSOP #:	107-17679-00060

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

I hereby certify that Inland Paperboard and Packaging is
 in compliance with the requirements of MSOP 107-17679-00060.
 not in compliance with the requirements of MSOP 107-17679-00060.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Inland Paperboard and Packaging
Source Address: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Mailing Address: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit No.: 107-17679-00060

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

I certify that, based on information and belief formed after reasonable inquiry, the statements information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by an authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.

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

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

Source Background and Description

Source Name:	Inland Paperboard and Packaging
Source Location:	801 North Englewood Drive, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	2653
Operation Permit No.:	107-17679-00060
Permit Reviewer:	Stephanie A. Roy

The Office of Air Quality (OAQ) has reviewed an application from Inland Paperboard and Packaging relating to the operation of a corrugated and solid fiber box manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas-fired boiler, identified as A-57, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 002, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (b) One (1) natural gas-fired boiler, identified as A-58, constructed in 1971, using #2 fuel oil as backup, exhausting to Stack 003, rated at 14.645 million British thermal units per hour and 350 horsepower.
- (c) One (1) starch silo, identified as 004, constructed in 1972, equipped with baghouse 004 for particulate control, exhausting to Stack 004, capacity: 100,000 pounds of cornstarch.
- (d) One (1) trim waste collection system, identified as 005, constructed in 1972, consisting of a flexo transfer cyclone, exhausting to Stack 005, capacity: 5,449 pounds of trim waste per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) One (1) 99-inch corrugator, identified as C-40, constructed in 1972, equipped with the one (1) trim waste collection system identified as 005, capacity: 1,000 feet per minute and 113,845 pounds of paper per hour.
- (b) One (1) dust collection system used to clean board prior to printing, identified as 006, constructed in 1997, equipped with a baghouse for particulate control, exhausting to Stack 006, throughput: 46,762 pounds of board per hour or 7,320 pounds of dust per year.
- (c) One (1) cornstarch mixing tank, constructed in 1972, capacity: 3,000 gallons of cornstarch.

- (d) Two (2) cornstarch storage tanks, identified as Tank 1 and Tank 2, both constructed in 1972, capacity: 3,000 gallons of cornstarch, each.
- (e) One (1) spare tank for cornstarch storage, identified as Spare Tank, constructed in 1990, capacity: 500 gallons of cornstarch.
- (f) One (1) standby #2 fuel tank, constructed in 1998, capacity: 12,000 gallons of fuel.
- (g) One (1) waste water treatment system.
- (h) One (1) three-color die cutter and gluer, identified as EO-75, constructed in 1994, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 113 inches.
- (i) One (1) two-color die cutter and gluer, identified as EO-93, constructed in 2000, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 113 inches.
- (k) One (1) three-color flexo folder gluer, identified as EG-128, constructed in 1991, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 94 inches.
- (l) One (1) two-color flexo folder gluer, identified as EG-25, constructed in 1972, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 80 inches.
- (m) One (1) two-color flexo folder gluer, identified as EG-113, constructed in 1989, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.
- (n) One (1) three-color flexo folder gluer, identified as EG-114, constructed in 1989, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.
- (o) One (1) two-color flexo folder gluer, identified as EG-30, constructed in 1972, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 110 inches.
- (p) One (1) two-color flexo folder gluer, identified as EG-74, constructed in 1983, equipped with a flowcoater for glue application, capacity: eight hundred (800) feet per minute with a maximum printing width of 66 inches.

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

OP 54-01-81-0063, issued November 24, 1976.

All conditions from the previous approval were incorporated into this permit.

Enforcement Issue

- (a) IDEM is aware that equipment, specifically the one (1) 99-inch corrugator that is equipped with the one (1) trim waste collection system, has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) IDEM is aware that the source did not apply for an MSOP in a timely manner. IDEM is reviewing this matter and will take appropriate action.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
002	Boiler A-57	36.0	2.00	10,000	500
003	Boiler A-58	36.0	2.00	10,000	500
004	starch silo and baghouse	46.0	10.0	unknown	ambient
005	trim collection system and cyclone	60.0	16.0	8,500	ambient
006	dust collection system	50.0	10.0	unknown	ambient

Recommendation

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

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

An application for the purposes of this review was received on April 30, 2003, with additional information received on October 27, 2003, December 10, 2003, March 4, 2004 and March 18, 2004.

Emission Calculations

See Appendix A, pages 1 through 17 of 17, of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

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

is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	34.4
PM ₁₀	34.4
SO ₂	65.8
VOC	13.5
CO	10.8
NO _x	18.5

HAPs	Potential to Emit (tons/yr)
Benzene	0.0003
Dichlorobenzene	0.0002
Formaldehyde	0.812
Hexane	0.231
Toluene	0.0004
Lead	0.001
Cadmium	0.0004
Chromium	0.0004
Manganese	0.001
Nickel	0.0004
Arsenic	0.001
Beryllium	0.0004
Mercury	0.0004
Selenium	0.002
Glycol Ether	0.501
Methanol	4.09
Acetaldehyde	0.438
Vinyl Acetate	0.219
Total	6.05

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year and the potential to emit of PM₁₀ and SO₂ is greater than 25 tons

per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

(b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

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

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	3.06
PM ₁₀	3.06
SO ₂	65.8
VOC	13.5
CO	10.8
NO _x	18.5

Single HAP	Less than 10
Combination HAPs	Less than 25

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) The emissions were based on the permit application submitted by the source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 107-17679-00060, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

- (a) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40, Subpart D, since they each have a heat input rate less than 250 million British thermal units per hour.
- (b) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40a, Subpart Da, since their 1971 construction dates are prior to the September 18, 1978 applicability date of NSPS Subpart Da.
- (c) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40b, Subpart Db, since their 1971 construction dates are prior to the June 19, 1984 applicability date of NSPS Subpart Db and each boiler has a heat input rating less than 100 million British thermal units per hour.
- (d) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40c, Subpart Dc, since their 1971 construction dates are prior to the June 9, 1989 applicability date of NSPS Subpart Dc.
- (e) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.430, Subpart QQ, because the printing presses are flexographic printing presses, not rotogravure printing presses.
- (f) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.580, Subpart FFF, because this source is not a rotogravure printing line.

- (g) This source applies coatings to paper. Therefore, the requirements of 40 CFR 60, Subpart VVV, Standards of Performance for Polymeric Coating of Supporting Substrates Facilities, are not applicable.
- (h) The source is not a major source of HAPs and does not produce pulp, paper or paperboard. Therefore, the requirements of 40 CFR 63, Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, are not applicable.
- (i) This source is not a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press. Therefore, the requirements of 40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry, do not apply.
- (j) This source performs only flexographic web printing. Therefore, pursuant to 40 CFR 63.3300(c), this source is not subject to the requirements of 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.

State Rule Applicability – Entire Source

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

The unrestricted potential to emit from this source is less than 250 tons per year of any pollutant and it is not one of the 28 sources listed under 326 IAC 2-2. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

- (a) The one (1) dust collection system, the one (1) standby #2 fuel tank and the one (1) two-color die cutter and gluer identified as EO-93 were constructed after July 27, 1997. The potential to emit of these facilities for any single HAP is less than ten (10) tons per year and the potential to emit from any combination of HAPs is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply to the one (1) dust collection system, the one (1) standby #2 fuel tank and the one (1) two-color die cutter and gluer identified as EO-93.
- (b) All remaining equipment were constructed prior to July 27, 1997 and are therefore not subject to the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).

326 IAC 2-6 (Emission Reporting)

This source is located in Montgomery County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This rule requires the source 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).

State Rule Applicability – Individual Facilities

326 IAC 6-2-3 (Particulate emissions limitations for facilities specified in 326 IAC 6-2-1(c))

- (a) The two (2) boilers constructed 1971, which is prior to September 23, 1983, each with a heat input capacity of 14.645 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3(a). This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty-(60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet.

For the two (2) boilers identified as A-57 and A-58:

$$Pt = 50 \times 0.67 \times 36 / 76.5 \times (29.29)^{0.75} \times 2^{0.25} = 1.05 \text{ lb/MMBtu}$$

- (b) Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pound per million British thermal units heat input. Therefore,

because this limitation is more stringent than the limitation calculated in subpart (a), the two (2) boilers shall be limited to emissions of 0.8 pound per million British thermal units.

Based on Appendix A, the total potential to emit PM from the two (2) boilers is:

$$1.85 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) / 29.29 \text{ MMBtu/hr} = 0.014 \text{ lb/MMBtu}$$

Therefore, the two (2) boilers will each comply with this rule.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(1), the two (2) boilers are not subject to the requirements of 326 IAC 6-3-2 because they are considered combustion for indirect heating.
- (b) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) starch silo, identified as 004, equipped with a baghouse, is not subject to the requirements of 326 IAC 6-3-2 because it has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (c) The particulate from the one (1) trim waste collection system, identified as 005, which collects trim waste from the (1) 99-inch corrugator, shall be limited by the following:

Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 55 \times 56.9^{0.11} - 40 = 45.8 \text{ pounds per hour}$$

The potential PM emissions from the one (1) trim waste collection system are equal to 5.48 pounds per hour and the potential controlled PM emissions from the one (1) trim waste collection system are equal to 0.274 pounds per hour. Therefore, the one (1) trim waste collection system will comply with this rule.

- (d) The particulate from the one (1) dust collection system, identified as 006, which cleans the board prior to printing and gluing, shall be limited by the following:

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

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

$$E = 4.10 \times 23.4^{0.67} = 33.9 \text{ pounds per hour}$$

The controlled potential PM emissions from the one (1) dust collection system are equal to 1.68 pounds per hour and the potential controlled PM emissions from one (1) dust collection system are equal to 0.002 pounds per hour. Therefore, the one (1) dust collection system will comply with this rule.

326 IAC 7-1.1 (Sulfur dioxide emissions limitations)

Pursuant to 326 IAC 7-1.1-2, the sulfur dioxide emissions from the two (2) boilers, A-57 and A-58, when burning No. 2 fuel oil are limited to five tenths (0.5) pounds per million British thermal units heat input. The applicant has verified that all fuel oil used in these boilers will comply with this rule on No. 2 fuel oil by using fuel oil with a sulfur content not to exceed 0.5%.

326 IAC 3-7-4 (Fuel sampling and analysis procedures: record keeping requirements; standard operating procedures)

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input for No. 2 fuel oil by the following procedures:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two (2) boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

326 IAC 8-2 (Surface Coating Emission Limitations)

- (a) Pursuant to 326 IAC 8-2-1(a)(1), the two (2) flexo folder gluers, identified as EG-25 and EG-30, constructed in 1972, are not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because they are located in Montgomery County and were constructed before January 1, 1980.
- (b) This source consists of web coating presses in which one hundred percent (100%) of the paper is coated. Therefore, the source-wide printing operations, constructed after January 1, 1980, are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations). Pursuant to this rule, the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from the printing presses. The presses will comply with this rule as follows:

The six (6) non heatset flexographic printing presses constructed after 1980 consist of EO-75, EO-93, EG-128, EG-113, EG-114 and EG-74. The worst case coating that will be used at any of these presses contains 8.64 pounds of VOC per gallon of coating less water which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, in order to comply with this limitation, the source will calculate the daily volume

weighted average of all coatings applied for all printing operations. Calculation of the volume weighted average is shown on Appendix A, pages 15 and 16 of 17.

The volume weighted average shall be determined by the following equation:

$$A = [3 (C \times U) / 3 U]$$

Where: A = the volume weighted average in pounds VOC per gallon;
C = the VOC content of the coating in pounds VOC per gallon; and
U = the usage rate of the coating in gallons per unit, hour, day or other unit of time

A = 0.556 pounds VOC per gallon

The volume weighted average for all coatings is equal to 0.556 pounds VOC per gallon of coating. The six (6) non heatset flexographic printing presses (EO-75, EO-93, EG-128, EG-113, EG-114 and EG-74) will therefore comply with the VOC content limit of 2.9 pounds of VOC per gallon of coating less water.

Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the daily volume weighted average, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

$$E = L / (1 - L / D)$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC.
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied
= 4.79 pounds VOC per gallon of coating solids

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

The printing presses at this source are not packaging rotogravure, publication rotogravure or flexographic printing presses. Therefore, the requirements of 326 IAC 8-5-5 are not applicable.

Conclusion

The operation of this corrugated and solid fiber box manufacturing source shall be subject to the conditions of the Minor Source Operating Permit 107-17679-00060.

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

Potential Corrugator Production

Maximum Line Speed (ft/min)	1000
Maximum Web Width (ft)	8.25
Weight of Products (lbs/MMft ²)	115
Potential Production (MMft ² /yr)	4336
Potential Production (lbs/yr)	498663000
Potential Production (tons/yr)	249332

Production Factor

Actual Production (tons/yr)	123746
Production Factor	2.01

Methodology

Potential Production (MMft²/yr) = (Maximum Line Speed (ft/min) x Maximum Web Width (ft) x (60min/hr) x (8760hrs/yr)) / (1000000ft/MMft²)

Potential Production (lbs/yr) = Maximum Line Speed (ft/min) x Weight of Products (lbs/MMft²) x Potential Production (MMft²/yr)

Potential Production (tons/yr) = Potential Production (lbs/yr) / (2000lbs/yr)

Production Factor = Potential Production (tons/yr) / Actual Production (tons/yr)

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: MSOP 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

INK VOCS					
Ink Name	Amount Purchased in 2002 (lbs)	Total Pounds VOC (2002)	VOC Content % by weight	VOC Emissions (tons in 2002)	Potential VOC Emissions (tons/yr)
Reflex Blue	2250	55.8	2.48%	0.028	0.056
Process Blue	2700	2.70	0.100%	0.001	0.003
Black	1750	39.03	2.23%	0.020	0.039
Orange	1750	90.65	5.18%	0.045	0.091
Green	350	0.00	0.00%	0.00	0.00
Purple	650	6.31	0.971%	0.003	0.006
LT Fast Purple	40.0	0.00	0.00%	0.00	0.00
Iron Oxide Red	45.0	0.600	1.33%	0.0003	0.001
B.S. Red	450	0.450	0.100%	0.0002	0.0005
Dark Red	850	34.0	4.00%	0.017	0.034
Y.S. Red	3150	8.51	0.270%	0.004	0.009
B.S. Magenta	135	0.00	0.00%	0.00	0.00
Y.S. Magenta	667	0.00	0.00%	0.00	0.00
Iron Oxide Red	180	3.94	2.19%	0.002	0.004
White	12500	240	1.92%	0.120	0.241
Yellow	9350	464.7	4.97%	0.232	0.467
Opaque Yellow	450	9.86	2.19%	0.005	0.010
HG GCMI 31 Blue MK NK	32073	246.96	0.770%	0.123	0.248
HG-9 GCMI 33 Blue MK NK	4950	42.57	0.860%	0.021	0.043
HG SPEC AB 03605 Blue NK	2512	17.84	0.710%	0.009	0.018
HG SPEC LC GCMI 39 Blue	30150	126.63	0.420%	0.063	0.127
HG LC AB 03282 Blue NK	13365	85.54	0.640%	0.043	0.086
HG HR GCMI 39 Blue	1035	10.25	0.990%	0.005	0.010
HG GCMI: 34 Blue MK NK	1040	7.18	0.690%	0.004	0.007
Hydo Busch 9309 Black	17623	648.53	3.68%	0.324	0.652
Hydo GCMI 90 Black	83600	2073.28	2.48%	1.04	2.08
Box II Black	360	10.48	2.91%	0.005	0.011
Hydro Premium St.	248	2.88	1.16%	0.001	0.003
WB Antiskid Black	45.0	0.670	1.49%	0.0003	0.001
HYG-8 GCMI 970 Gray	40.0	0.230	0.575%	0.0001	0.0002
HG PMS 873U Gold MK	90.0	1.01	1.12%	0.001	0.001
HG-9 GCMI 20 Green MK NK	3645	49.21	1.35%	0.025	0.049
HG GCMI 21 Green MK NK	10193	122.32	1.20%	0.061	0.123
HG SD Papa Johns Green	16200	223.56	1.38%	0.112	0.225
HG Papa Johns Green	16965	283.32	1.67%	0.142	0.285

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**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: MSOP 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

INK VOCS					
Ink Name	Amount Purchased in 2002 (lbs)	Total Pounds VOC (2002)	VOC Content % by weight	VOC Emissions (tons in 2002)	Potential VOC Emissions (tons/yr)
Clear Extender	3150	137.97	4.38%	0.069	0.139
Filled Extender	40840	367.56	0.900%	0.184	0.369
TR Filled Extender	4600	21.16	0.460%	0.011	0.021
HG Filled Extender	47283	430.28	0.910%	0.215	0.432
Hydro Skid Resist Varnish	900	12.42	1.38%	0.006	0.012
HG GCMI: 52 Brown MK NK	5490	69.17	1.26%	0.035	0.070
HG GCMI: 49 Purple MK NK	405	1.66	0.410%	0.001	0.002
HG GCMI: 73 Red MK NK	855	10.0	1.17%	0.005	0.010
HG GCMI: 74 Red MK NK	17908	250.71	1.40%	0.125	0.252
HG-9 GCMI 75 Red MK NK	18738	258.58	1.38%	0.129	0.260
HG GCMI 76 Red MK NK	26325	408.04	1.55%	0.204	0.410
HG GCMI 609 Maroon MK NK	3510	45.28	1.29%	0.023	0.046
HG A. Busch 07201 Red NK	1050	9.77	0.930%	0.005	0.010
HG SD Papa Johns Red	15738	190.43	1.21%	0.095	0.191
HG 99135 Match Red	270	2.30	0.852%	0.001	0.002
HG HR GCMI 74 Red	585	8.07	1.38%	0.004	0.008
HG Papa John Red MK	13140	194.47	1.48%	0.097	0.195
HG-9 GCMI 75 Red MK NK	225	3.02	1.34%	0.002	0.003
HG GCMI 74 Red MK NK	225	2.30	1.02%	0.001	0.002
HG GCMI 74 Red MK NK	180	2.11	1.17%	0.001	0.002
Hydro GCMI 91 White	270	0.540	0.200%	0.0003	0.001
Hydro Opacity White	495	19.75	3.99%	0.010	0.020
High Opacity White	495	1.58	0.319%	0.001	0.002
GCMI 91 White	4920	17.71	0.360%	0.009	0.018
H-50 Wax Compound	84.0	4.51	5.37%	0.002	0.005
Hydro Process PH Adjuster	2040	652.46	32.0%	0.326	0.656
Hydro Anti Foam Solution	1406	0.00	0.00%	0.00	0.00
Flexo 06S2070 Retarder	40.0	40.0	100%	0.020	0.040
Total	520309	8070.86	220%	4.04	8.11

Methodology

VOC Content % by weight = Total Pounds VOC (2002) / Amount Purchased in 2002 (lbs)

VOC Emissions (tons in 2002) = (Amount purchased in 2002 (lbs) x VOC Content by Weight (%)) / (2000 lbs/ton)

Potential VOC Emissions (tons/yr) = VOC Emissions (tons in 2002) x 2.01 Production Factor

**Appendix A: Emissions Calculations
HAPs From Printing Press Operations**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: MSOP 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

INK HAPs					
Ink Name	Amount Purchased in 2002 (lbs)	Total Pounds Glycol Ether (2002)	HAP Content % by weight	HAP Emissions (tons in 2002)	Potential HAP Emissions (tons/yr)
Reflex Blue	2250	20.03	0.890%	0.010	0.020
Process Blue	2700	2.70	0.100%	0.001	0.003
Black	1750	16.45	0.940%	0.008	0.017
Orange	1750	15.58	0.890%	0.008	0.016
Green	350	0.00	0.00%	0.00	0.00
Purple	650	0.00	0.00%	0.00	0.00
LT Fast Purple	40.0	0.00	0.00%	0.00	0.00
Iron Oxide Red	45.0	0.190	0.422%	0.0001	0.0002
B.S. Red	450	0.450	0.100%	0.0002	0.0005
Dark Red	850	0.850	0.100%	0.0004	0.001
Y.S. Red	3150	8.19	0.260%	0.004	0.008
B.S. Magenta	135	0.00	0.00%	0.00	0.00
Y.S. Magenta	667	0.00	0.00%	0.00	0.00
Iron Oxide Red	180	1.62	0.900%	0.001	0.002
White	12500	85.0	0.680%	0.043	0.085
Yellow	9350	77.61	0.830%	0.039	0.078
Opaque Yellow	450	3.96	0.880%	0.002	0.004
HG GCMI 31 Blue MK NK	32073	12.83	0.040%	0.006	0.013
HG-9 GCMI 33 Blue MK NK	4950	3.47	0.070%	0.002	0.003
HG SPEC AB 03605 Blue NK	2512	1.51	0.060%	0.001	0.002
HG SPEC LC GCMI 39 Blue	30150	12.06	0.040%	0.006	0.012
HG LC AB 03282 Blue NK	13365	6.68	0.050%	0.003	0.007
HG HR GCMI 39 Blue	1035	0.830	0.080%	0.0004	0.001
HG GCMI: 34 Blue MK NK	1040	0.310	0.030%	0.0002	0.0003
Hydo Busch 9309 Black	17623	40.53	0.230%	0.020	0.041
Hydo GCMI 90 Black	83600	33.44	0.040%	0.017	0.034
Box II Black	360	1.04	0.289%	0.001	0.001
Hydro Premium St.	248	0.170	0.069%	0.0001	0.0002
WB Antiskid Black	45.0	0.190	0.422%	0.0001	0.0002
HYG-8 GCMI 970 Gray	40.0	0.020	0.050%	0.00001	0.00002
HG PMS 873U Gold MK	90.0	0.080	0.089%	0.00004	0.0001
HG-9 GCMI 20 Green MK NK	3645	4.01	0.110%	0.002	0.004
HG GCMI 21 Green MK NK	10193	9.17	0.090%	0.005	0.009
HG SD Papa Johns Green	16200	12.96	0.080%	0.006	0.013
HG Papa Johns Green	16965	13.57	0.080%	0.007	0.014

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**Appendix A: Emissions Calculations
HAP From Printing Press Operations**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: MSOP 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

INK HAPs					
Ink Name	Amount Purchased in 2002 (lbs)	Total Pounds Glycol Ether (2002)	HAP Content % by weight	HAP Emissions (tons in 2002)	Potential HAP Emissions (tons/yr)
Clear Extender	3150	3.15	0.100%	0.002	0.003
Filled Extender	40840	12.25	0.030%	0.006	0.012
TR Filled Extender	4600	0.920	0.020%	0.0005	0.001
HG Filled Extender	47283	4.73	0.010%	0.002	0.005
Hydro Skid Resist Varnish	900	5.22	0.580%	0.003	0.005
HG GCMI: 52 Brown MK NK	5490	2.75	0.050%	0.001	0.003
HG GCMI: 49 Purple MK NK	405	0.120	0.030%	0.0001	0.0001
HG GCMI: 73 Red MK NK	855	0.680	0.080%	0.0003	0.001
HG GCMI: 74 Red MK NK	17908	10.74	0.060%	0.005	0.011
HG-9 GCMI 75 Red MK NK	18738	11.24	0.060%	0.006	0.011
HG GCMI 76 Red MK NK	26325	15.8	0.060%	0.008	0.016
HG GCMI 609 Maroon MK NK	3510	1.76	0.050%	0.001	0.002
HG A. Busch 07201 Red NK	1050	1.16	0.110%	0.001	0.001
HG SD Papa Johns Red	15738	18.89	0.120%	0.009	0.019
HG 99135 Match Red	270	0.240	0.089%	0.0001	0.0002
HG HR GCMI 74 Red	585	0.350	0.060%	0.0002	0.0004
HG Papa John Red MK	13140	14.45	0.110%	0.007	0.015
HG-9 GCMI 75 Red MK NK	225	0.140	0.062%	0.0001	0.0001
HG GCMI 74 Red MK NK	225	0.140	0.062%	0.0001	0.0001
HG GCMI 74 Red MK NK	180	0.130	0.072%	0.0001	0.0001
Hydro GCMI 91 White	270	0.460	0.170%	0.0002	0.0005
Hydro Opacity White	495	0.990	0.200%	0.0005	0.001
High Opacity White	495	0.200	0.040%	0.0001	0.0002
GCMI 91 White	4920	1.48	0.030%	0.001	0.001
H-50 Wax Compound	84.0	0.300	0.357%	0.0002	0.000
Hydro Process PH Adjuster	2040	4.49	0.220%	0.002	0.005
Hydro Anti Foam Solution	1406	0.00	0.00%	0.00	0.00
Flexo 06S2070 Retarder	40.0	0.00	0.00%	0.00	0.00
Total	520309	498	0.096%	0.249	0.501

Methodology

HAP Content % by weight = Total Pounds Glycol Ether (2002) / Amount Purchased in 2002 (lbs)

HAP Emissions (tons in 2002) = (Amount purchased in 2002 (lbs) x HAP Content by Weight (%)) / (2000 lbs/ton)

Potential VOC Emissions (tons/yr) = VOC Emissions (tons in 2002) x 2.01 Production Factor

**Appendix A: Emissions Calculations
VOC and Particulate
From Glue Booths**

**Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Application Date: April 30, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Glue Booth EG-128																
WB-2527-650	10.4	39.3%	38.6%	0.710%	48.13%	62.0%	0.0002	9067	0.142	0.074	0.134	3.21	0.586	0.00	N/A	100%
WB-2527	10.4	39.0%	38.3%	0.710%	47.76%	60.0%	0.0002	9067	0.141	0.074	0.134	3.21	0.586	0.00	N/A	100%
WB-3131-E001	8.90	53.4%	52.8%	0.570%	67.98%	49.0%	0.0002	9067	0.158	0.051	0.092	2.21	0.403	0.00	N/A	100%
Glue Booth EG-25																
WB-2527-650	10.4	39.3%	38.6%	0.710%	48.13%	62.0%	0.0002	16847	0.142	0.074	0.249	5.97	1.09	0.00	N/A	100%
WB-2527	10.4	39.0%	38.3%	0.710%	47.76%	60.0%	0.0002	16847	0.141	0.074	0.249	5.97	1.09	0.00	N/A	100%
WB-3131-E001	8.90	53.4%	52.8%	0.570%	67.98%	49.0%	0.0002	16847	0.158	0.051	0.171	4.10	0.749	0.00	N/A	100%
Glue Booth EG-113																
WB-2527-650	10.4	39.3%	38.6%	0.710%	48.13%	62.0%	0.0002	12614	0.142	0.074	0.186	4.47	0.816	0.00	N/A	100%
WB-2527	10.4	39.0%	38.3%	0.710%	47.76%	60.0%	0.0002	12614	0.141	0.074	0.186	4.47	0.816	0.00	N/A	100%
WB-3131-E001	8.90	53.4%	52.8%	0.570%	67.98%	49.0%	0.0002	12614	0.158	0.051	0.128	3.07	0.561	0.00	N/A	100%
Glue Booth EG-114																
WB-2527-650	10.4	39.3%	38.6%	0.710%	48.13%	62.0%	0.0002	12654	0.142	0.074	0.187	4.48	0.819	0.00	N/A	100%
WB-2527	10.4	39.0%	38.3%	0.710%	47.76%	60.0%	0.0002	12654	0.141	0.074	0.187	4.48	0.819	0.00	N/A	100%
WB-3131-E001	8.90	53.4%	52.8%	0.570%	67.98%	49.0%	0.0002	12654	0.158	0.051	0.128	3.08	0.562	0.00	N/A	100%
Glue Booth EG-30																
WB-2527-650	10.4	39.3%	38.6%	0.700%	48.13%	62.0%	0.0002	10604	0.140	0.073	0.154	3.71	0.676	0.00	N/A	100%
WB-2527	10.4	39.0%	38.3%	0.710%	47.76%	60.0%	0.0002	10604	0.141	0.074	0.157	3.76	0.686	0.00	N/A	100%
WB-3131-E001	8.90	53.4%	52.8%	0.570%	67.98%	49.0%	0.0002	10604	0.158	0.051	0.108	2.58	0.471	0.00	N/A	100%
Glue Booth EG-74																
WB-2527-650	10.4	39.3%	38.6%	0.710%	48.13%	62.0%	0.0002	10077	0.142	0.074	0.149	3.57	0.652	0.00	N/A	100%
WB-2527	10.4	39.0%	38.3%	0.710%	47.76%	60.0%	0.0002	10077	0.141	0.074	0.149	3.57	0.652	0.00	N/A	100%
WB-3131-E001	8.90	53.4%	52.8%	0.570%	67.98%	49.0%	0.0002	10077	0.158	0.051	0.102	2.45	0.448	0.00	N/A	100%

PM Control Efficiency: 0.00%

State Potential Emissions	Add worst case coating to all solvents	Total Uncontrolled	1.06	25.5	4.65	0.00
		Total Controlled	1.06	25.5	4.65	0.00

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations

HAP Emission Calculations
From Glue Booths

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Pit ID: 107-00060
Permit Reviewer: Stephanie A. Roy
Publication Date: April 30, 2003

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Acetaldehyde	Weight % Vinyl Acetate	Weight % Formaldehyde	Weight % Methanol	Acetaldehyde Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)
Glue Booth EG-128											
WB-2527-650	10.4	0.0002	9067	0.00%	0.00%	0.030%	0.6154%	0.00	0.00	0.025	0.508
WB-2527	10.4	0.0002	9067	0.00%	0.00%	0.030%	0.6190%	0.00	0.00	0.025	0.511
WB-3131-E001	8.90	0.0002	9067	0.0781%	0.0391%	0.0156%	0.0318%	0.055	0.028	0.011	0.022
Glue Booth EG-25											
WB-2527-650	10.4	0.0002	16847	0.00%	0.00%	0.030%	0.6154%	0.00	0.00	0.046	0.945
WB-2527	10.4	0.0002	16847	0.00%	0.00%	0.030%	0.6190%	0.00	0.00	0.046	0.950
WB-3131-E001	8.90	0.0002	16847	0.0781%	0.0391%	0.0156%	0.0318%	0.103	0.051	0.020	0.042
Glue Booth EG-113											
WB-2527-650	10.4	0.0002	12614	0.00%	0.00%	0.030%	0.6154%	0.00	0.00	0.034	0.707
WB-2527	10.4	0.0002	12614	0.00%	0.00%	0.030%	0.6190%	0.00	0.00	0.034	0.711
WB-3131-E001	8.90	0.0002	12614	0.0781%	0.0391%	0.0156%	0.0318%	0.077	0.038	0.015	0.031
Glue Booth EG-114											
WB-2527-650	10.4	0.0002	12654	0.00%	0.00%	0.030%	0.6154%	0.00	0.00	0.035	0.709
WB-2527	10.4	0.0002	12654	0.00%	0.00%	0.030%	0.6190%	0.00	0.00	0.035	0.714
WB-3131-E001	8.90	0.0002	12654	0.0781%	0.0391%	0.0156%	0.0318%	0.077	0.039	0.015	0.031
Glue Booth EG-30											
WB-2527-650	10.4	0.0002	10604	0.00%	0.00%	0.030%	0.6154%	0.00	0.00	0.029	0.595
WB-2527	10.4	0.0002	10604	0.00%	0.00%	0.030%	0.6190%	0.00	0.00	0.029	0.598
WB-3131-E001	8.90	0.0002	10604	0.0781%	0.0391%	0.0156%	0.0318%	0.065	0.032	0.013	0.026
Glue Booth EG-74											
WB-2527-650	10.4	0.0002	10077	0.00%	0.00%	0.030%	0.6154%	0.00	0.00	0.028	0.565
WB-2527	10.4	0.0002	10077	0.00%	0.00%	0.030%	0.6190%	0.00	0.00	0.028	0.568
WB-3131-E001	8.90	0.0002	10077	0.0781%	0.0391%	0.0156%	0.0318%	0.061	0.031	0.012	0.025
Total								0.438	0.219	0.802	4.09

Total State Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Total = sum of worst case coatings for all glue booths

**Appendix A: Emissions Calculations
PM from Starch Silo 004**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

AP-42 Emission Factor for Starch Loading

0.00049

Control Efficiency

99.9%

Month (2002)	Starch Usage (lbs)	Starch Usage (tons)	Controlled PM (lbs/yr)	Controlled PM (tons/yr)	Uncontrolled PM (lbs/yr)	Uncontrolled PM (tons/yr)
January	288390	144	0.142	0.00007	142	0.071
February	337850	169	0.166	0.00008	166	0.083
March	451690	226	0.222	0.0001	222	0.111
April	418140	209	0.206	0.0001	206	0.103
May	398210	199	0.196	0.0001	196	0.098
June	505880	253	0.249	0.0001	249	0.125
July	406520	203	0.200	0.0001	200	0.100
August	405220	203	0.200	0.0001	200	0.100
September	473900	237	0.233	0.0001	233	0.117
October	384140	192	0.189	0.00009	189	0.095
November	373380	187	0.184	0.00009	184	0.092
December	424860	212	0.209	0.0001	209	0.105
Total	4868180	2434	2.40	0.001	2397	1.20

Methodology

Emission Factor for Starch Loading found in AP-42 Chapter 9.9.7 for Corn Wet Milling.

Starch Usage (tons) = Starch Usage (lbs) / 2000lbs/ton

Controlled PM Emissions (lbs/yr) = Starch Usage (tons) x 0.00049lbs/ton * 2.01 Production Factor

Controlled PM Emissions (tons/yr) = PM Emissions (lbs/yr) x (ton/2000lbs)

Uncontrolled PM Emissions (lbs/yr) = Controlled PM Emissions (lbs/yr) / (1 - control efficiency)

Uncontrolled PM Emissions (tons/yr) = Controlled PM Emissions (tons/yr) x (ton/2000lbs)

**Appendix A: Emissions Calculations
PM from Trim Waste Collection System 005**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Pit ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

Control Efficiency	Production Factor
95.0%	2.01

Month (2002)	Baled Waste (lbs)	Uncontrolled PM (lbs/yr)	Uncontrolled PM (tons/yr)	Controlled PM (lbs/yr)	Controlled PM (tons/yr)
January	1746400	1746	0.873	87.3	0.044
February	1875400	1875	0.938	93.8	0.047
March	2587600	2588	1.29	129	0.065
April	1936400	1936	0.968	96.8	0.048
May	1729000	1729	0.865	86.5	0.043
June	2412200	2412	1.21	120.6	0.060
July	1993000	1993	0.997	99.7	0.050
August	2198000	2198	1.10	110	0.055
September	1301600	1302	0.651	65.1	0.033
October	1941000	1941	0.971	97.1	0.049
November	2210200	2210	1.11	111	0.055
December	1937918	1938	0.969	96.9	0.048
Total	23868718	23869	11.9	1193	0.597
Overall Total PTE PM		47976	24.0	2399	1.20

*Assume that only 0.10% of all baled waste is dust.

PM = PM10

Methodology

Uncontrolled PM (lbs/yr) = Baled Waste (lbs) x 0.10%.

Uncontrolled PM (tons/yr) = Uncontrolled PM (lbs/yr) x (ton/2000lbs)

Controlled PM (lbs/yr) = Uncontrolled PM (lbs/yr) x (1 - control efficiency)

Controlled PM (tons/yr) = Controlled PM (lbs/yr) / (1 ton/2000lbs)

Total PTE PM = Total Emissions x 2.01 Production Factor

**Appendix A: Emissions Calculations
PM from Dust Collection System 006**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

Amount of PM Collected per year (tons)	3.66
Collection Efficiency (%)	99.9%
Total PM Emissions per year (tons)	3.66
Potential PM Emissions per year (tons)	7.36
Controlled PM Emissions per year (tons)	0.007

Methodology

Total PM Emissions per year (tons) = Amount of PM Collected per year (tons) / Collection Efficiency (%)

Potential PM Emissions per year (tons) = Total PM Emissions per year (tons) x 2.01 Production Factor

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Inland Paperboard and Packaging
Address, City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.500

29.3

1853

Two (2) back-up fuel oil fired boilers rated at 14.645 MMBtu/hr

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.00	71.0 (142.0S)	20.0	0.340	5.00
Potential Emission in tons/yr	1.85	65.8	18.5	0.315	4.63

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 138,500 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

See page 12 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Inland Paperboard and Packaging
Address, City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 0.000004	Beryllium 0.000003	Cadmium 0.000003	Chromium 0.000003	Lead 0.000009
Potential Emission in tons/yr	0.001	0.0004	0.0004	0.0004	0.001

HAPs - Metals (continued)					
Emission Factor in lb/mmBtu	Mercury 0.000003	Manganese 0.000006	Nickel 0.000003	Selenium 0.00002	Total
Potential Emission in tons/yr	0.0004	0.001	0.0004	0.002	0.006

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

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

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

29.3

257

Two (2) natural gas-fired boilers rated at 14.645 MMBtu/hr, each.

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.244	0.975	0.077	12.8	0.706	10.8

*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, 1-03-006-02, 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 14 for HAPs emissions calculations.

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

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Pit ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0003	0.0002	0.010	0.231	0.0004

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total
Potential Emission in tons/yr	0.0001	0.0001	0.0002	0.00005	0.0003	0.242

Methodology is the same as page 13.

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

**Appendix A: Emissions Calculations
Volume Weighted Average**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: MSOP 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

INK VOCS	C			U	(C x U)
Ink Name	Amount Purchased in 2002 (lbs)	VOC lb/gal coating less water	Density lbs/gal	Usage Rate gal/year	Usage Rate gal/year x VOC lb/gal
Reflex Blue	2250	0.360	9.00	250	90.0
Process Blue	2700	0.250	9.50	284	71.1
Black	1750	0.380	9.00	194	73.9
Orange	1750	0.910	9.30	188	171
Green	350	0.260	10.50	33.3	8.67
Purple	650	0.830	9.30	69.9	58.0
LT Fast Purple	40.0	0.00	9.60	4.17	0.00
Iron Oxide Red	45.0	0.450	12.47	3.61	1.62
B.S. Red	450	0.220	9.60	46.9	10.3
Dark Red	850	0.960	9.20	92.4	88.7
Y.S. Red	3150	0.070	9.60	328	23.0
B.S. Magenta	135	0.00	0.980	138	0.00
Y.S. Magenta	667	0.00	9.60	69.5	0.00
Iron Oxide Red	180	0.460	12.2	14.8	6.79
White	12500	0.360	13.4	933	336
Yellow	9350	0.830	9.20	1016	844
Opaque Yellow	450	0.410	11.8	38.1	15.6
HG GCM1 31 Blue MK NK	32073	0.230	11.5	2789	641
HG-9 GCM1 33 Blue MK NK	4950	0.240	11.0	450	108
HG SPEC AB 03605 Blue NK	2512	0.290	11.7	215	62.3
HG SPEC LC GCM1 39 Blue	30150	0.250	11.7	2577	644
HG LC AB 03282 Blue NK	13365	0.300	11.5	1162	349
HG HR GCM1 39 Blue	1035	0.270	9.10	114	30.7
HG GCM1: 34 Blue MK NK	1040	0.170	11.6	89.7	15.2
Hydo Busch 9309 Black	17623	0.560	8.10	2176	1218
Hydo GCM1 90 Black	83600	1.29	9.00	9289	11983
Box II Black	360	0.690	9.10	39.6	27.3
Hydro Premium St.	248	0.180	9.40	26.4	4.75
WB Antiskid Black	45.0	0.400	9.50	4.74	1.89
HYG-8 GCM1 970 Gray	40.0	0.230	11.7	3.42	0.786
HG PMS 873U Gold MK	90.0	0.400	12.0	7.50	3.00
HG-9 GCM1 20 Green MK NK	3645	0.410	11.0	331	136
HG GCM1 21 Green MK NK	10193	0.380	11.2	910	346
HG SD Papa Johns Green	16200	0.410	11.1	1459	598
HG Papa Johns Green	16965	0.360	11.1	1528	550

Continued on Page 16 of 17

**Appendix A: Emissions Calculations
Volume Weighted Average**

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: MSOP 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003

INK VOCS	C			U	(C x U)
Ink Name	Amount Purchased in 2002 (lbs)	VOC lb/gal coating less water	Density lbs/gal	Usage Rate gal/year	VOC Usage Rate gal/year x VOC lb/gal
Clear Extender	3150	0.140	8.70	362	50.7
Filled Extender	40840	0.220	11.9	3432	755
TR Filled Extender	4600	0.350	10.58	435	152
HG Filled Extender	47283	0.120	11.68	4048	486
Hydro Skid Resist Varnish	900	0.270	8.80	102	27.6
HG GCMI: 52 Brown MK NK	5490	0.380	11.4	482	183
HG GCMI: 49 Purple MK NK	405	0.220	11.4	35.5	7.82
HG GCMI: 73 Red MK NK	855	0.380	11.4	75.0	28.5
HG GCMI: 74 Red MK NK	17908	0.400	10.9	1643	657
HG-9 GCMI 75 Red MK NK	18738	0.400	10.9	1719	688
HG GCMI 76 Red MK NK	26325	0.450	11.0	2393	1077
HG GCMI 609 Maroon MK NK	3510	0.390	11.1	316	123
HG A. Busch 07201 Red NK	1050	0.380	10.6	99.1	37.6
HG SD Papa Johns Red	15738	0.440	11.3	1393	613
HG 99135 Match Red	270	0.320	11.4	23.7	7.58
HG HR GCMI 74 Red	585	0.410	10.9	53.7	22.0
HG Papa John Red MK	13140	0.520	11.3	1163	605
HG-9 GCMI 75 Red MK NK	225	0.160	10.9	20.6	3.30
HG GCMI 74 Red MK NK	225	0.090	10.9	20.6	1.86
HG GCMI 74 Red MK NK	180	0.100	11.4	15.8	1.58
Hydro GCMI 91 White	270	0.070	12.0	22.5	1.58
Hydro Opacity White	495	1.24	14.2	34.9	43.2
High Opacity White	495	0.160	15.0	33.0	5.28
GCMI 91 White	4920	0.130	12.3	400	52.0
H-50 Wax Compound	84.0	0.870	8.50	9.88	8.60
Hydro Process PH Adjuster	2040	4.88	8.40	243	1185
Hydro Anti Foam Solution	1406	0.00	7.50	187	0.00
Flexo 06S2070 Retarder	40.0	8.64	8.65	4.62	40.0
Total	520309			45643	25381

Volume Weighted Average (A)

A = 0.556 lbs VOC per gal

Methodology

Usage Rate (gal/yr) = Amount purchased in 2002 (lbs/yr) / Density (lbs/gal)

VOC Usage Rate (lbs/yr) = VOC lb/gal coating less water x Usage Rate (gal/yr)

Volume Weighted Average (lbs VOC/gal) A = Total VOC Usage Rate (lbs/yr) / Total Usage Rate (gal/yr)

**Appendix A: Emissions Calculations
Summary from Entire Source**

**Company Name: Inland Paperboard and Packaging
Address City IN Zip: 801 North Englewood Drive, Crawfordsville, Indiana 47933
Permit Number: 107-17679
Plt ID: 107-00060
Reviewer: Stephanie A. Roy
Date: April 30, 2003**

Uncontrolled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Printing	0.00	0.00	0.00	0.00	8.11	0.00
Gluers	0.00	0.00	0.00	0.00	4.65	0.00
Starch Silo 004	1.20	1.20	0.00	0.00	0.00	0.00
Trim Waste 005	24.0	24.0	0.00	0.00	0.00	0.00
Dust Collection 006	7.36	7.36	0.00	0.00	0.00	0.00
Fuel Oil Combustion	1.85	1.85	65.8	18.5	0.315	4.63
Natural Gas Combustion	0.244	0.975	0.077	12.8	0.706	10.8
Total	34.4	34.4	65.8	18.5	13.5	10.8

Controlled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Printing	0.00	0.00	0.00	0.00	8.11	0.00
Gluers	0.00	0.00	0.00	0.00	4.65	0.00
Starch Silo 004	0.001	0.001	0.00	0.00	0.00	0.00
Trim Waste 005	1.20	1.20	0.00	0.00	0.00	0.00
Dust Collection 006	0.007	0.007	0.00	0.00	0.00	0.00
Fuel Oil Combustion	1.85	1.85	65.8	18.5	0.315	4.63
Natural Gas Combustion	0.244	0.975	0.077	12.8	0.706	10.8
Total	3.06	3.06	65.8	18.5	13.5	10.8

HAPs Emissions (tons per year)

Facility	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead
Printing	0.00	0.00	0.00	0.00	0.00	0.00
Gluers	0.00	0.00	0.802	0.00	0.00	0.00
Fuel Oil Combustion	0.00	0.00	0.00	0.00	0.00	0.001
Natural Gas Combustion	0.0003	0.0002	0.010	0.231	0.0004	0.0001
Total	0.0003	0.0002	0.812	0.231	0.0004	0.001

Facility	Cadmium	Chromium	Manganese	Nickel	Arsenic	Beryllium
Printing	0.00	0.00	0.00	0.00	0.00	0.00
Gluers	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Oil Combustion	0.0004	0.0004	0.001	0.0004	0.001	0.0004
Natural Gas Combustion	0.0001	0.0002	0.00005	0.0003	0.00	0.00
Total	0.0004	0.0004	0.001	0.0004	0.001	0.0004

Facility	Mercury	Selenium	Glycol Ether	Methanol
Printing	0.00	0.00	0.501	0.00
Gluers	0.00	0.00	0.00	4.09
Fuel Oil Combustion	0.0004	0.002	0.00	0.00
Natural Gas Combustion	0.00	0.00	0.00	0.00
Total	0.0004	0.002	0.501	4.09

Facility	Acetaldehyde	Vinyl Acetate	Total
Printing	0.00	0.00	0.501
Gluers	0.438	0.219	5.55
Fuel Oil Combustion	0.00	0.00	0.006
Natural Gas Combustion	0.00	0.00	0.242
Total	0.438	0.219	6.05