



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: September 5, 2007
RE: Pregis Inovative Packaging / 099-17908-00028
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Pregis Innovative Packaging, Inc.
1411 Pidco Drive
Plymouth, Indiana 46563**

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

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

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

Operation Permit No.: T099-17908-00028	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 5, 2007 Expiration Date: September 5, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary packaging materials manufacturing plant.

Source Address:	1411 Pidco Drive, Plymouth, Indiana 46563
Mailing Address:	1411 Pidco Drive, Plymouth, Indiana 46563
General Source Phone Number:	(574) 936-7065
SIC Code:	3083, 3086
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, installed in 1998, PL-3, installed in 1994, and BG-1, installed in 1999, respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each plank (PL-1 and PL-3) line and the foam sheet (BG-1) extrusion line consist of the following equipment:
- (1) One (1) extruder;
 - (2) One (1) foam profile die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) common controlled environment storage area;
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 with filters for particulate emissions control; and
 - (6) One (1) scrap grinder for each of lines PL-1 and PL-3, identified as JSP for PL-1 and GR-9 for PL-3 with filters for particulate emissions control.
- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, installed in 1986, and SL-2, installed in 1987, respectively. Both foam sheet extrusion lines use one (1) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-4. Each foam sheet line consists of the following equipment:
- (1) One (1) extruder;
 - (2) One (1) foam sheet die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) oven; and
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-1 with filters for particulate emissions control.

- (c) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (d) A finished product storage warehouse with emissions uncontrolled.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) Nine (9) natural gas-fired furnaces, each rated at 0.4 MMBtu per hour;
 - (2) Two (2) natural gas-fired furnaces, each rated at 0.58 MMBtu per hour; and
 - (3) Five (5) natural gas-fired furnaces, each rated at 0.1 MMBtu per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including two (2) parts washers which are cold cleaner degreasers without remote solvent reservoirs. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(e)(2)]
- (d) Closed loop heating and cooling systems.
- (e) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (i) Stationary fire pumps.
- (j) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (k) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than the following thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (1) Three (3) bubble pack wrap lines;
- (2) Heat seal on bubble pack;
- (3) Two (2) Kraft paper package mailer lines;
- (4) Plank laminator;
- (5) VOC emissions from the customer scrap recycling process;
- (6) Grinding and machining operations; [326 IAC 6-3-2(e)(2)]
- (7) Storage silos for plastic pellets;

- (8) Ink Jet Printers;
- (9) Heat seal bars.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T099-17908-00028, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T099-17908-00028 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on 9/18/2001.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

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

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

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

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

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

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

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

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

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) Two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, installed in 1998, PL-3, installed in 1994, and BG-1, installed in 1999, respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each plank (PL-1 and PL-3) line and the foam sheet (BG-1) extrusion line consist of the following equipment:
- (1) One (1) extruder;
 - (2) One (1) foam profile die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) common controlled environment storage area;
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 with filters for particulate emissions control; and
 - (6) One (1) scrap grinder for each of lines PL-1 and PL-3, identified as JSP for PL-1 and GR-9 for PL-3 with filters for particulate emissions control.
- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, installed in 1986, and SL-2, installed in 1987, respectively. Both foam sheet extrusion lines use one (1) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-4. Each foam sheet line consists of the following equipment:
- (1) One (1) extruder;
 - (2) One (1) foam sheet die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) oven; and
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-1 with filters for particulate emissions control.
- (c) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (d) A finished product storage warehouse with emissions uncontrolled.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

- (a) The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The thermal oxidizers CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines (PL-1, PL-3, BG-1, SL-1 and SL-2), and each must have an overall control efficiency of 95% for the scrap lines.

This input limitation along with operation of the regenerative thermal oxidizers, identified as CE03 and CE04, at all times that the plank extrusion lines and the foam sheet extrusion lines are in operation shall result in equivalent VOC emissions from the extrusion lines and the uncontrolled finished product storage warehouse of 249 tons per twelve (12) consecutive month period. The potential to emit (PTE) of VOC for the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to CP No. 099-9807-00028, issued on October 29, 1998, and Significant Source Modification 099-16015-00028, issued on October 22, 2002, Best Available Control Technology (BACT) for the source has been determined to be the use of regenerative thermal oxidizers CE03 and CE04 and their respective capture systems. CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and each must have an overall control efficiency of 95% for the scrap lines.

VOC emissions from the finished product storage warehouse are not included in this control requirement. The uncontrolled VOC emissions from the finished product storage warehouse are accounted for using a Mass Balance Methodology based on retention data as described in Condition D.1.8(c).

CE03 and CE04 and their respective capture systems shall each operate at all times when the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, are in operation to demonstrate compliance with the VOC limit of 249 tons per twelve (12) consecutive month period.

D.1.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from grinders used in the extrusion lines shall be limited as follows:

Grinder Designation	Process Weight Rate, tons/hr	Allowable particulate emissions (lb/hr)
GR-1	0.225	1.51
JSP	0.225	1.51
GR-9	0.30	1.83
GR-8	0.40	2.22

The pounds per hour limitations were calculated using the following equation:

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Prior to April 2009, in order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE04 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

- (b) Prior to January 2009, in order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE03 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (c) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.2(a)(1) shall be determined pursuant to 326 IAC 8-1-4 and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer of the VOC-containing materials used the copies of the "as supplied" and/or "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate (PM)

In order to comply with condition D.1.3, the filters for particulate control shall be in operation and control emissions from the grinders at all times when SL-1, SL-2, PL-1, BG-1, and PL-3 are in operation.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP No. 099-9807-00028, issued on October 29, 1998, and Significant Source Modification 099-16015-00028, issued on October 22, 2002, and in order to comply with condition D.1.2 the following shall apply:

When operating:

- (a) CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test that achieves a destruction efficiency of 98% for the manufacturing process of the foam sheet and plank lines and 97% destruction efficiency for the scrap lines.
- (b) the capture system associated with CE03 shall be maintained as follows:
 - (A) the owner or operator shall maintain the minimum capture system differential pressure at negative 0.007 inches of water difference between the inside and outside of the permanent total enclosure.
 - (B) Upon completion of all subsequent performance tests, the owner or operator shall maintain the minimum capture system differential pressure established by the most recent performance test.
- (c) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

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

D.1.9 Regenerative Thermal Oxidizer and Capture System Operations [40 CFR 64]

- (a) CE03 and CE04 and their respective capture systems shall each operate at all times SL-1, SL-2, PL-1, PL-3, and BG-1 are in operation to demonstrate compliance with the VOC limit of 249 tons per twelve (12) consecutive month period.
- (b) When operating, CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test, in order for CE03 and CE04 and their respective capture systems to each maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.
- (c) The Permittee shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in condition D.1.2. The operation of this device can allow for brief periods of time when temperature is not recorded to allow for a change of the recording media.
- (d) This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
- (e) The Permittee shall measure the differential pressure of the permanent total enclosure (PTE) capture systems associated with the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) foam sheet extrusion lines, identified as SL-1 and SL-2, once per day when these facilities are in operation in order for each to maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.
- (f) The differential pressure of the PTE capture system shall be observed at least once per day when the thermal oxidizers are in operation. When for any two consecutive required once per day pressure readings, the differential pressure is below the normal indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE capture system or a level established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is below the indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE capture system or a level established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount of VOC content by weight of the blowing agent in all stages of the processes (winder, warehouse finished goods and scrap recycling). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Spreadsheet data shall be maintained to demonstrate how the VOC contents were determined;
 - (2) A log of the dates of use;
 - (3) The total blowing agent usage for each month; and
 - (4) Monthly emissions in pounds of VOC.
- (b) Continuous readings of the operating temperature shall be maintained to document compliance with Condition D.1.9.
- (c) Once per day readings of the negative pressure at the inlet of the capture system shall be maintained to document compliance with Condition D.1.9. The Permittee shall include in its daily record when a pressure reading is not taken and the reason for the lack of a pressure reading (e.g. the process did not operate that day).
- (d) Records of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE03 and CE04) which result in violations of the Office of Air Quality rules shall be kept for a period of three (3) years and made available to OAQ upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAQ no later than four (4) daytime business hours after the occurrence.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

Insignificant Activities

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(e)(2)]

- (k) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than the following thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (6) Grinding and machining operations; [326 IAC 6-3-2(e)(2)]

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

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

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

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

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

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

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

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of cold cleaner degreaser operations without remote solvent reservoirs construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.3 Particulate [326 IAC 6-3-2(e)(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. This limit applies to the following insignificant activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Grinding and machining operations.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Pregis Innovative Packaging, Inc.
Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-17908-00028

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Pregis Innovative Packaging, Inc.
Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-17908-00028

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Pregis Innovative Packaging, Inc.
 Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
 Mailing Address: 1411 Pidco Drive, Plymouth, Indiana 46563
 Part 70 Permit No.: T099-17908-00028
 Facility: Entire Source
 Parameter: VOC PTE (blowing agent usage)
 Limit: The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Blowing Agent Usage This Month (tons)	VOC Blowing Agent Usage Previous 11 Months (tons)	12 Month Total VOC Blowing Agent Usage (tons)
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Pregis Innovative Packaging, Inc.
 Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
 Mailing Address: 1411 Pidco Drive, Plymouth, Indiana 46563
 Part 70 Permit No.: T099-17908-00028

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name: Pregis Innovative Packaging, Inc.
Source Location: 1411 Pidco Drive, Plymouth, Indiana 46563
County: Marshall
SIC Code: 3083, 3086
Operation Permit No.: T099-17908-00028
Permit Reviewer: Trish Earls/EVP

On May 30, 2007, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Pregis Innovative Packaging, Inc. had applied for a Part 70 Operating Permit Renewal to continue to operate a stationary packaging materials manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 12, 2007, Steven Gorski of Pregis Innovative Packaging, Inc. (Pregis) submitted comments on the proposed permit. A summary of the comments and responses is as follows (additions in bold, deletions in strikeout):

Comment #1

In section D.1.1, Pregis requests that IDEM add the word "uncontrolled" to the following permit condition:

This input limitation along with operation of the regenerative thermal oxidizers, identified as CE03 and CE04, at all times that the plank extrusion lines and the foam sheet extrusion lines are in operation shall result in equivalent VOC emissions from the extrusion lines and the uncontrolled finished product storage warehouse of 249 tons per twelve (12) consecutive month period. The potential to emit (PTE) of VOC for the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

This clarification will make the permit consistent with paragraph (d) on page 2 of the TSD which lists the "Permitted Emissions Units and Pollution Control Equipment" to include "a finished product storage warehouse with emissions uncontrolled". As you know from our prior discussions regarding CAM, the finished product storage warehouse emissions are uncontrolled and such emissions were included in calculating the plant's PSD minor source status as set forth in our renewal application. Thus, our requested change to the permit is sensible and easy to implement as it makes the TSD and permit consistent and avoids any confusion.

Response #1

Since compliance with the blowing agent input limitation along with operation of the regenerative thermal oxidizers, identified as CE03 and CE04, at all times that the plank extrusion lines and the foam sheet extrusion lines are in operation combined with uncontrolled emissions from the finished product storage warehouse will limit source-wide VOC emissions to less than 250 tons per year so that 326 IAC 2-2 (PSD) does not apply, condition D.1.1 will be revised as requested to clarify that there are no controls required for the finished product storage warehouse to comply with the limit. Condition D.1.1 is revised as follows:

D.1.1 PSD Minor Limit [326 IAC 2-2]

- (a) The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The thermal oxidizers CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines (PL-1, PL-3, BG-1, SL-1 and SL-2), and each must have an overall control efficiency of 95% for the scrap lines.

This input limitation along with operation of the regenerative thermal oxidizers, identified as CE03 and CE04, at all times that the plank extrusion lines and the foam sheet extrusion lines are in operation shall result in equivalent VOC emissions from the extrusion lines and the **uncontrolled** finished product storage warehouse of 249 tons per twelve (12) consecutive month period. The potential to emit (PTE) of VOC for the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Comment #2

We request that the same clarification also be reflected in Section D.1.2 of the draft permit, General Reduction Requirements for New Facilities. Pregis requests an additional sentence be added to the end of the first paragraph of Section D.1.2 that states,

VOC emissions from the finished product warehouse are not included in this control requirement. These uncontrolled emissions are accounted for using a Mass Balance Methodology, described in Section D.1.8(c).

This clarification will assure that the term "manufacturing processes" is clearly understood to not include the finished product warehouse.

Response #2

Since the control requirements in condition D.1.2 only apply to the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, which are controlled by regenerative thermal oxidizers CE03 and CE04 and their respective capture systems, and the finished product storage warehouse is uncontrolled and does not require controls to comply with the VOC emission limit of 249 tons per year, condition D.1.2 is revised for clarification as follows:

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to CP No. 099-9807-00028, issued on October 29, 1998, and Significant Source Modification 099-16015-00028, issued on October 22, 2002, Best Available Control Technology (BACT) for the source has been determined to be the use of regenerative thermal oxidizers CE03 and CE04 and their respective capture systems. CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and each must have an overall control efficiency of 95% for the scrap lines.

VOC emissions from the finished product storage warehouse are not included in this control requirement. The uncontrolled VOC emissions from the finished product storage warehouse are accounted for using a Mass Balance Methodology based on retention data as described in Condition D.1.8(c).

CE03 and CE04 and their respective capture systems shall each operate at all times when the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, are in operation to demonstrate compliance with the VOC limit of 249 tons per twelve (12) consecutive month period.

On July 24, 2007, additional comments were received from Steven Gorski of Pregis Innovative Packaging, Inc. on the proposed permit. A summary of the comments and responses is as follows (additions in bold, deletions in strikethrough):

Comment #1

The description of equipment making up each plank line (PL-1 and PL-3) and the foam sheet extrusion line (BG-1) does not agree between Conditions A.2(a)(4) and D.1(a)(4) of the draft permit and page 2 of the Technical Support Document (TSD). The list of equipment included in each line is correct in the TSD, and should be updated in Conditions A.2(a) and D.1(a) to read:

- (1) One (1) extruder;
- (2) One (1) foam profile die;
- (3) One (1) permanent total enclosure;
- (4) One (1) **common controlled environment storage area**;
- (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 with filters for particulate emissions control; and
- (6) One (1) scrap grinder for each of lines PL-1 and PL-3, identified as JSP for PL-1, and GR-9 for PL-3, with filters for particulate emissions control.

Response #1

The facility descriptions in sections A.2 and D.1 have been corrected to match the description in the TSD as follows:

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

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

- (a) Two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, installed in 1998, PL-3, installed in 1994, and BG-1, installed in 1999, respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each plank (PL-1 and PL-3) line and the foam sheet (BG-1) extrusion line consist of the following equipment:
 - (1) One (1) extruder;
 - (2) One (1) foam profile die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) ~~even~~ **common controlled environment storage area**;
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 with filters for particulate emissions control; and
 - (6) One (1) scrap grinder for each of lines PL-1 and PL-3, identified as JSP for PL-1 and GR-9 for PL-3 with filters for particulate emissions control.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) Two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, installed in 1998, PL-3, installed in 1994, and BG-1, installed in 1999, respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each plank (PL-1 and PL-3) line and the foam sheet (BG-1) extrusion line consist of the following equipment:
 - (1) One (1) extruder;
 - (2) One (1) foam profile die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) ~~even~~ **common controlled environment storage area**;

- (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 with filters for particulate emissions control; and
 - (6) One (1) scrap grinder for each of lines PL-1 and PL-3, identified as JSP for PL-1 and GR-9 for PL-3 with filters for particulate emissions control.
- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, installed in 1986, and SL-2, installed in 1987, respectively. Both foam sheet extrusion lines use one (1) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-4. Each foam sheet line consists of the following equipment:
- (1) One (1) extruder;
 - (2) One (1) foam sheet die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) oven; and
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-1 with filters for particulate emissions control.
- (c) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (d) A finished product storage warehouse with emissions uncontrolled.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment #2

Conditions D.1.5(a) and D.1.5(b) of the draft permit require stack testing to be conducted on the regenerative thermal oxidizers (CE03 and CE04) at the plant. In each condition, a time frame during which testing must be conducted is listed. We request that the earlier of the two dates on these time windows be removed so that we have the flexibility to conduct testing at any time prior to the due date. As such, we request that Condition D.1.5(a) be updated to read:

Prior to April 2009, in order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE04 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Also, we request that Condition D.1.5(b) be updated to read:

Prior to January 2009, in order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE03 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Response #2

Condition D.1.5 is revised to read as follows:

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) ~~During the period between October 2008 and~~ **Prior to April 2009, in order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE04 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.**

- (b) ~~During the period between July 2008 and~~ **Prior to** January 2009, in order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE03 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

- (c) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Pregis Innovative Packaging, Inc.
Source Location:	1411 Pidco Drive, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	3083, 3086
Operation Permit No.:	T099-5969-00028
Operation Permit Issuance Date:	June 28, 1999
Permit Renewal No.:	T099-17908-00028
Permit Reviewer:	Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Pregis Innovative Packaging, Inc. (formerly Pactiv Protective Packaging, Inc.) relating to the operation of a stationary packaging materials manufacturing plant.

History

On August 28, 2003, Pregis Innovative Packaging, Inc. (formerly Pactiv Protective Packaging, Inc.) submitted an application to the OAQ requesting to renew its operating permit. Pregis Innovative Packaging, Inc. was issued Part 70 Operating Permit T099-5969-00028 on June 28, 1999.

As part of this renewal application, the source has stated that buildings 8 and 9 ovens have been demonstrated to meet the requirements for a permanent total enclosure (PTE) based on a Method 204 analysis that was conducted for Pregis on August 11, 2004.

What is referred to as Work in Progress (WIP) is foam that may be stored in a controlled environment consisting of storing recently extruded foam at elevated temperatures. These areas are referred to as Buildings 8 and 9 common controlled environment storage areas. VOC emissions from the foam stored in these buildings are controlled by an existing thermal oxidizer (CE03). The observations made during the Method 204 analysis are as follows:

- (a) All observed air flows were flowing into the building with face velocities in excess of 200 feet per minute (3,600 m/hr);
- (b) All observed exhaust points are located at least four equivalent duct diameters from any natural draft opening (NDO);
- (c) The total of all observed natural draft openings were less than 5% of the surface area of all the walls, floor and ceiling; and
- (d) All observed doors were closed.

Permitted Emission Units and Pollution Control Equipment

- (a) Two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, installed in 1998, PL-3, installed in 1994, and BG-1, installed in 1999, respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each plank (PL-1 and PL-3) line and the foam sheet (BG-1) extrusion line consist of the following equipment:

- (1) One (1) extruder;
 - (2) One (1) foam profile die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) common controlled environment storage area;
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 with filters for particulate emissions control; and
 - (6) One (1) scrap grinder for each of lines PL-1 and PL-3, identified as JSP for PL-1, and GR-9 for PL-3, with filters for particulate emissions control.
- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, installed in 1986, and SL-2, installed in 1987, respectively. Both foam sheet extrusion lines use one (1) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-4. Each foam sheet line consists of the following equipment.
- (1) One (1) extruder;
 - (2) One (1) foam sheet die;
 - (3) One (1) permanent total enclosure;
 - (4) One (1) oven; and
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-1 with filters for particulate emissions control.
- (c) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (d) A finished product storage warehouse with emissions uncontrolled.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) Nine (9) natural gas-fired furnaces, each rated at 0.4 MMBtu per hour;
 - (2) Two (2) natural gas-fired furnaces, each rated at 0.58 MMBtu per hour; and
 - (3) Five (5) natural gas-fired furnaces, each rated at 0.1 MMBtu per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including two (2) parts washers which are cold cleaner degreasers without remote solvent reservoirs. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(e)(2)]
- (d) Closed loop heating and cooling systems.
- (e) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (i) Stationary fire pumps.
- (j) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(k) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than the following thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (1) Three (3) bubble pack wrap lines;
- (2) Heat seal on bubble pack;
- (3) Two (2) Kraft paper package mailer lines;
- (4) Plank laminator;
- (5) VOC emissions from the customer scrap recycling process;
- (6) Grinding and machining operations; [326 IAC 6-3-2(e)(2)]
- (7) Storage silos for plastic pellets;
- (8) Ink Jet Printers;
- (9) Heat seal bars.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T099-5969-00028 on June 28, 1999, the source has constructed or has been operating under the following approvals:

- (a) First Significant Permit Modification No. 099-11161-00028, issued on November 4, 1999;
- (b) First Administrative Amendment No. 099-11469-00028, issued on November 4, 1999;
- (c) First Minor Permit Modification No. 099-12283-00028, issued on July 11, 2000;
- (d) Second Administrative Amendment No. 099-13841-00028, issued on April 10, 2001;
- (e) First Significant Source Modification No. 099-13908-00028, issued on October 4, 2001;
- (f) Third Administrative Amendment No.: 099-15185-00028, issued on November 29, 2001;
- (g) Title V Reopening No. 099-13419-00028, issued on February 4, 2002;
- (h) Second Significant Source Modification No.: 099-16015-00028, issued on October 22, 2002;
- (i) Third Significant Permit Modification No.: 099-16299-00028, issued on November 7, 2002;
- (j) Fourth Administrative Amendment No.: 099-20044-00028, issued on December 20, 2004;
and
- (k) Fifth Administrative Amendment No. 099-20247-00028, issued on February 22, 2005.

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

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

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) Title V Permit No. T099-5969-00028, issued on June 28, 1999; Condition D.1.3

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from SL-1, SL-2, PL-1, PL-2, PL-3, and PL-4, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall not exceed the pound per hour emission rate established as E in the following formula:

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

Reason not incorporated: There is no particulate matter generated by the foam manufacturing operations at this source; therefore, this condition is not applicable.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 7).

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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) Marshall County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO ₂	Less than 100
VOC	Greater than 250
CO	Less than 100
NO _x	Less than 100

HAPs	Unrestricted Potential Emissions (tons/yr)
Any single HAP	Negligible
Total	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM-10	0.0
SO ₂	0.0
VOC	202.0
CO	1.0
NO _x	1.0
HAP (specify)	Not reported

Part 70 Permit Conditions

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

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

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Foam sheet extrusion lines SL-1 and SL-2, Plank extrusion lines PL-1, PL-3 and Foam sheet extrusion line BG-1 and finished product storage warehouse*	0.00	0.00	Negl.	<249.0	Negl.	Negl.	Negl.
Resin Unload, Resin Pellet Handling, RPP Silo Filling, Reclaim	0.50	0.50	0.00	0.00	0.00	0.00	0.00
Natural gas combustion	0.04	0.18	0.01	0.13	1.94	2.30	0.04
Total PTE	0.54	0.68	0.01	<249.13	1.94	2.30	0.04
Major Source Threshold	250	250	250	250	250	250	N/A

* Emissions also include VOC emissions from Work In Progress (WIP) foam storage.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit involved:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
PL-1 - VOC	Thermal Oxidizer CE-03	Y	116.31	3.26	100	Y	N
PL-3 - VOC	Thermal Oxidizer CE-03	Y	116.31	3.26	100	Y	N
BG-1 - VOC	Thermal Oxidizer CE-03	Y	828.18	6.82	100	Y	N
Finished product warehouse - VOC	None	N	158.26	158.26	100	N	N
GR-8 - PM10	fabric filters	Y	Negl.	Negl.	100	N	N
JSP - PM10	fabric filters	Y	Negl.	Negl.	100	N	N
GR-9 - PM10	fabric filters	Y	Negl.	Negl.	100	N	N
SL-1 - VOC	Thermal Oxidizer CE-04	Y	542.27	9.85	100	Y	N
SL-2 - VOC	Thermal Oxidizer CE-04	Y	542.27	9.85	100	Y	N
GR-1 - PM10	fabric filters	Y	Negl.	Negl.	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, which are controlled by the regenerative thermal oxidizer identified as CE03, and the two (2) foam sheet extrusion lines, identified as SL-1 and SL-2, which are controlled by the regenerative thermal oxidizer identified as CE04 for VOC.

The two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, which are controlled by the regenerative thermal oxidizer identified as CE03 and the two (2) foam sheet extrusion lines, identified as SL-1 and SL-2, controlled by the regenerative thermal oxidizer identified as CE04 are not "large units" since the potential to emit of VOC after control is less than 100 tons per year for each. Therefore, pursuant to 40 CFR 64.5(b), the Permittee was required to submit a CAM plan as part of the Title V renewal application. The Permittee did submit CAM plans for CE03 and CE04 as part of the Title V renewal application.

The Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

- (b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) are not included in this permit for the two (2) 12,000 gallon blowing agent storage tanks. Pursuant to 40 CFR 60.110b(a), as amended in the October 15, 2003 Federal Register, storage tanks with a storage capacity of less than 75 cubic meters (19,813 gallons) are not subject to this rule. Therefore, the requirements of this rule were not included in the permit for the two (2) 12,000 gallon blowing agent storage tanks.
- (c) The requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110, Subpart K; or 40 CFR 60.110a, Subpart Ka) were not included in the permit for the two (2) 12,000 gallon blowing agent storage tanks because the storage tanks store blowing agent which is not a petroleum liquid. The tanks were brought to their present location in 1986, which is after the May 19, 1978 applicability date for Subpart K, and falls after the May 18, 1978 to July 23, 1984 applicability date for Subpart Ka. Also, the storage capacity of each tank is less than the applicability threshold of 40,000 gallons for Subpart K and Subpart Ka.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR Part 63, Subpart U, National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins were not included in this permit for this source because the source does not include any elastomer product process units (EPPU) as defined in the rule and the source is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR Part 63, Subpart JJJ, National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins were not included in this permit for this source because the source does not include any thermoplastic product process units (TPPU) as defined in the rule and the source is not a major source of HAPs.
- (f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source because it is not a major source of HAPs.

State Rule Applicability – Entire Source

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

This source, which is not one of the twenty-eight (28) listed source categories under this rule, constructed in 1986, after the August 7, 1977 rule applicability date, was initially a minor PSD source since VOC emissions from SL-1 after control were less than 250 tons per year. The installation of SL-2 in 1987 was a minor modification to an existing minor PSD source since VOC emissions after control were less than 250 tons per year; however, the source became a major stationary source under this rule at that time. The installation of PL-3 in 1994 was a minor modification to an existing major PSD source since VOC emissions after control were less than 40 tons per year. A modification to the existing major source was permitted in CP No. 099-9807-00028, issued on October 29, 1998, and was determined to be a minor modification to an existing major source. At that time, the source elected to take a source wide limit on the amount of blowing agent input, equivalent to a potential to emit of 249 tons per year of VOC, therefore after the issuance of CP No. 099-9807-00028, the source was considered a minor source.

A Significant Source Modification No. 099-13908-00028 was issued on October 4, 2001 for the addition of an extruded polystyrene foam insulation board manufacturing line, identified as ES-24, to the existing source. This modification to an existing minor stationary source was not major because the emission increase was less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements did not apply. However, after issuance of the Significant Source Modification, the potential to emit of VOC for the entire source was greater than 250 tons per year; therefore, the source became a major PSD source. However, construction of this polystyrene foam insulation board manufacturing line, including the associated insignificant activities, was never completed. At no time were any manufacturing materials brought on site for this polystyrene foam insulation board manufacturing line nor was the line ever operated. This emission unit was removed from the Part 70 permit by Administrative Amendment No. 099-20044-00028, issued on December 20, 2004. Because this unit was never constructed, the source did not become a major PSD source. All subsequent modifications to the source neither exceeded the PSD major modification thresholds nor caused the source-wide emissions to exceed 250 tons per year; therefore, 326 IAC 2-2 (PSD) was not applicable.

The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines (PL-1, PL-3, BG-1, SL-1 and SL-2), and each must have an overall control efficiency of 95% for the scrap lines. This input limitation along with operation of the regenerative thermal oxidizers, identified as CE03 and CE04, at all times that the plank extrusion lines and the foam sheet extrusion lines are in operation shall result in equivalent VOC emissions from the extrusion lines and the finished product storage warehouse of 249 tons per twelve (12) consecutive month period. The potential to emit (PTE) of VOC for the entire source shall not exceed 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2007. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4. The source is not subject to annual emission reporting under 326 IAC 2-6-3(a)(1) because the potential to emit of all pollutants, including federally enforceable emission limitations on VOC, is less than 250 tons per year.

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

The operation of this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2, the particulate from grinders used in the extrusion lines shall be limited as follows:

Grinder Designation	Process Weight Rate, tons/hr	Allowable particulate emissions (lb/hr)
GR-1	0.225	1.51
JSP	0.225	1.51
GR-9	0.30	1.83
GR-8	0.40	2.22

The above allowable emission limits were based on 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:

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

Because efficient material usage is essential to the economic viability of the process, Pregis reuses most of the scrap/trim plastic in the process. The plastic sheet/plank is ground by the grinders; ground plastic is drawn by vacuum (negative pressure) from the grinders to the reclaim extruders and repelletized. The repelletized plastic is stored in silos or gaylord boxes until it is reused again in the process or sold. The grinders are controlled by filters to control particulate emissions to the atmosphere which are negligible. The filters shall be in operation at all times that the grinders are in operation in order to comply with the above limits.

- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This includes the following activities:
 - (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; and

(2) Grinding and machining operations;

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

(a) Pursuant to CP No. 099-9807-00028, issued on October 29, 1998, and Significant Source Modification 099-16015-00028, Best Available Control Technology (BACT) for the source has been determined to be the use of regenerative thermal oxidizers CE03 and CE04 and their respective capture systems. CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and must each have an overall control efficiency of 95% for the scrap lines.

(1) CE03 and CE04 and their respective capture systems shall each operate at all times while associated Production lines are in operation to demonstrate compliance with the VOC limit of 249 tons per twelve (12) consecutive month period.

(2) When operating:

(A) CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test that achieves a destruction efficiency of 98% for the manufacturing process of the foam sheet and plank lines and 97% destruction efficiency for the scrap lines.

(B) the capture system associated with CE03 shall be maintained as follows:

- (i) The owner or operator shall maintain the minimum capture system differential pressure at negative 0.007 inches of water difference between the inside and outside of the permanent total enclosure.
- (ii) Upon completion of all subsequent performance tests, the owner or operator shall maintain the minimum capture system differential pressure established by the most recent performance test.

(b) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

326 IAC 8-3-2 (Cold Cleaner Degreasing Operation)

The insignificant degreasing operation at this source is subject to 326 IAC 8-3-2 because it was constructed after 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

For a source located in Marshall county, this rule applies to cold cleaner degreasers without remote solvent reservoirs that were constructed after July 1, 1990. The degreasing operations at this source were constructed after July 1, 1990, therefore, the requirements of this rule are applicable.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of cold cleaner degreaser operations without remote solvent reservoirs construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state with potential emissions of 100 tons or greater per year of VOC. This source was constructed in 1989, and is therefore not subject to this rule.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Previous stack tests to demonstrate compliance with the overall control efficiencies and minimum operating temperatures of the thermal oxidizers controlling VOC emissions were conducted as follows:

- (a) VOC testing was performed on February 2 - 4, 2000 on the regenerative thermal oxidizer (CE03) controlling the plank extrusion lines.
- (b) VOC testing was performed on March 8 - 9, 2000 on the two (2) regenerative thermal oxidizers (at that time these were CE01 and CE02 which have since been removed from the source under First Minor Permit Modification No. 099-12283-00028, issued on July 11, 2000) controlling the foam sheet extrusion lines.
- (c) VOC testing was performed on July 19 - 20, 2000 on the regenerative thermal oxidizer (CE04) (this oxidizer replaced CE01 and CE02 that were removed as noted above) controlling the foam sheet extrusion lines.

- (d) VOC testing was performed on February 21, 2001 on the regenerative thermal oxidizer (CE03) controlling the plank extrusion lines. Only line PL-2 (later re-designated as BG-1) was in operation.
- (e) VOC testing was performed on April 20, 2001 on the regenerative thermal oxidizer (CE04) controlling the foam sheet extrusion lines.
- (f) VOC testing was performed on May 15, 2002 on the regenerative thermal oxidizer (CE03) controlling the plank extrusion lines.
- (g) VOC testing was most recently performed on July 10, 2003 on the regenerative thermal oxidizer (CE03) controlling the plank extrusion lines.
- (h) VOC testing was most recently performed on October 3, 2003 on the regenerative thermal oxidizer (CE04) controlling the foam sheet extrusion lines.
- (i) When Pregis conducts new retention testing, these data are submitted to IDEM for review and approval. The latest retention data was submitted May 17, 2005.

All of the above tests indicated that the source was in compliance with the overall control efficiencies required in the Part 70 permit.

Repeat stack testing for this source will be required as follows:

- (a) During the period between October 2008 and April 2009, in order to demonstrate compliance with 326 IAC 8-1-6, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE04 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.
- (b) During the period between July 2008 and January 2009, in order to demonstrate compliance with 326 IAC 8-1-6, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE03 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.
- (c) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

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

- (a) The regenerative thermal oxidizers (CE03 and CE04) have applicable compliance monitoring conditions as specified below:
 - (1) When operating, CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test, in order for CE03 and CE04 and their respective capture systems to each maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.

- (2) The Permittee shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements). The operation of this device can allow for brief periods of time when temperature is not recorded to allow for a change of the recording media.
- (3) This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
- (4) The Permittee shall measure the differential pressure of the permanent total enclosure (PTE) capture systems associated with the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) foam sheet extrusion lines, identified as SL-1 and SL-2, once per day when these facilities are in operation in order for each to maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.
- (5) The differential pressure of the permanent total enclosure (PTE) capture system shall be observed at least once per day when the thermal oxidizers are in operation. When for any two consecutive required once per day pressure readings, the differential pressure is below the normal indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE or a level established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is below the indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE or a level established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the regenerative thermal oxidizers (CE03 and CE04) for the plank and foam sheet extrusion lines (PL-1, PL-3, and BG-1) and the foam sheet extrusion lines (SL-1 and SL-2) must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), 40 CFR 64 (CAM), and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on August 28, 2003. Additional information was received on July 29, 2004, November 2, 2004, April 13, 2005, May 26, 2005, and June 15, 2005.

Conclusion

The operation of this packaging materials manufacturing plant shall be subject to the conditions of this Part 70 permit 099-17908-00028.

Appendix A: Emission Calculations Summary

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Operating Permit No.: T099-17908-00028
Pit ID: 099-00028
Reviewer: Trish Earls

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	H-Cell Foam Production (BG-1)	Sheet Foam Production (SL-1, SL-2)	Plank Foam Production (PL-1, PL-3)	Finished Product Storage Warehouse	Resin Unload, Resin Pellet Handling, RPP Silo Filling, Reclaim	Natural Gas Combustion	TOTAL
PM	0.00	0.00	0.00	0.00	0.50	0.04	0.54
PM10	0.00	0.00	0.00	0.00	0.50	0.18	0.68
SO2	0.00	0.00	0.00	0.00	0.00	0.01	0.01
NOx	0.00	0.00	0.00	0.00	0.00	2.30	2.30
VOC	828.18	1,084.54	232.62	158.26	0.00	0.13	2,303.73
CO	0.00	0.00	0.00	0.00	0.00	1.94	1.94
total HAPs	negl.	negl.	negl.	negl.	0.00	0.04	0.04
worst case single HAP	negl.	negl.	negl.	negl.	0.00	(Hexane) 0.04	(Hexane) 0.04
Total emissions based on rated capacity at 8,760 hours/year.							
Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	H-Cell Foam Production (BG-1)	Sheet Foam Production (SL-1, SL-2)	Plank Foam Production (PL-1, PL-3)	Finished Product Storage Warehouse	Resin Unload, Resin Pellet Handling, RPP Silo Filling, Reclaim	Natural Gas Combustion	TOTAL
PM	0.00	0.00	0.00	0.00	0.50	0.04	0.54
PM10	0.00	0.00	0.00	0.00	0.50	0.18	0.68
SO2	0.00	0.00	0.00	0.00	0.00	0.01	0.01
NOx	0.00	0.00	0.00	0.00	0.00	2.30	2.30
VOC	6.82	19.70	6.52	158.26	0.00	0.13	191.43
CO	0.00	0.00	0.00	0.00	0.00	1.94	1.94
total HAPs	negl.	negl.	negl.	negl.	0.00	0.04	0.04
worst case single HAP	negl.	negl.	negl.	negl.	0.00	(Hexane) 0.04	(Hexane) 0.04
Total emissions based on rated capacity at 8,760 hours/year, after control and any applicable emission limits.							

Mass Balance Model for the Plymouth Facility

The emissions calculations are performed using a mass balance approach. The model is set up as a spreadsheet with four worksheets. Three of these worksheets are set up to do mass balance calculations for each product category (H-Cell, Sheet, and Plank), and the fourth worksheet contains retention values for the various foams within each product category. Data for other products can be added or the products can be segregated into families without affecting the workings of the mass balance models. Production data is used to calculate weighted average retention values for each product category, and these values are then imported into the various mass balance models.

In addition to the retention values, other inputs to the mass balance model are total solids processed, amount of blowing agent used, finished goods produced, collection efficiencies at various stages of the process, and destruction efficiency.

The governing equations for models for the various product categories are given in the attachment, along with sample calculations. Note that the model for H-Cell is the most involved as its manufacturing process has more steps than the other product categories, and that the models for sheet foam and plank derive from the one for the H-Cell.

Total site emissions is the sum of the emissions from the sheet, plank, and H-cell processes.

Appendix A: Emission Calculations				
	Company Name:	Pregis Innovative Packaging, Inc.		
	Address City IN Zip:	1411 Pidco Drive, Plymouth, Indiana 46563		
	Operating Permit No.:	T099-17908-00028		
	Plt ID:	099-00028		
	Reviewer:	Trish Earls		
	<i>Plymouth Mass Balance: H-cell (Laminated Foam Plank) - BG-1</i>			
1	Parameter	Symbol/Formula		
2	Total solids processed, lb/yr	m1	16,907,326	= 0.8773 * 2200 lb/hr * 8760 hrs
3	VOC used in foaming process, lb/yr	m2	2,362,747	= 0.1226 * 2200 lb/hr * 8760 hrs
4	VOC used for start-ups, lb/yr	E1	0	
5	Product SGO, lb/yr	m3	16,351,695	10% scrap rate
6	Converted product SGO (H-cell), lb/yr	m4	14,716,526	
7	Solids content of start-up scrap, lb/yr	m5	0	
8	Primary Extrusion			
9	VOC weight fraction in extruded foam, %	w1	6.900%	
10	Solids content of product SGO, lb/yr	m6 = (1 - w1) x m3	15,223,428	
11	Solids content of extrusion scrap, lb/yr	m7 = m1 - m5 - m6	1,683,898	
12	Amount of VOC in extruded foam, lb/yr	m8 = (w1 / (1 - w1)) x (m1 - m5)	1,253,067	
13	Amount of VOC available for control, lb/yr	m9 = m2 - m8	1,109,680	
14	Collection efficiency, %	ce1	100%	
15	WIP/Aging			
16	VOC weight fraction in aged foam, %	w2	4.800%	
17	Amount of VOC available for control, lb/yr	m10 = (w1 / (1 - w1) - w2 / (1 - w2)) x m6	360,699	
18	Collection efficiency, %	ce2	100%	
19	Laminating/Converting			
20	VOC weight fraction in laminated product, %	w3	4.800%	
21	Amount of VOC available for control, lb/yr	m11 = ((w2 / (1 - w2)) - (w3 / (1 - w3))) x m6	0	
22	Collection efficiency, %	ce3	100%	
23	Solids content of converted product SGO, lb/yr	m12 = (1 - w3) x m4	14,010,133	
24	Solids content of converting scrap, lb/yr	m13 = m6 - m12	1,213,295	
25	Reclaim Process			
26	Amount of VOC in extrusion scrap, lb/yr	m14 = (w1 / (1 - w1)) x m7	124,800	
27	Amount of VOC in converting scrap, lb/yr	m15 = (w3 / (1 - w3)) x m13	61,175	
28	Amount of VOC available for control, lb/yr	m16 = m14 + m15	185,975	
29	Collection efficiency, %	ce4	98%	
30	Emissions			
31	Total amount of VOC available for control, lb/yr	m17 = m9 + m10 + m11 + m16	1,656,354	Uncontrolled VOC emissions
32	Composite collection efficiency, %	ce = (m9 x ce1 + m10 x ce2 + m11 x ce3 + m16 x ce4) / m17	99.8%	
33	Amount of VOC not collected, lb/yr	E2 = m17 x (1 - ce)	3,719	
34	Destruction efficiency, %	de	99.4%	
35	Amount of VOC destroyed, lb/yr	m18 = (m17 - E2) x de	1,642,719	
36	Stack emissions, lb/yr	E3 = m17 - E2 - m18	9,916	
37	VOC wt fr in finished goods @ 14 days, %	w4	3.200%	
38	Amount of VOC released in the warehouse, lb/yr	E4 = (w3 / (1 - w3) - w4 / (1 - w4)) x m12	243,248	
39	Total emissions, lb/yr	E = E1 + E2 + E3 + E4	256,884	
40	Total emissions, tons/yr	E = (E1 + E2 + E3 + E4)/2000	128.44	

Appendix A: Emission Calculations				
	Company Name:	Pregis Innovative Packaging, Inc.		
	Address City IN Zip:	1411 Pidco Drive, Plymouth, Indiana 46563		
	Operating Permit No.:	T099-17908-00028		
	Plt ID:	099-00028		
	Reviewer:	Trish Earls		
Plymouth Mass Balance: Foam Sheet - SL-1 and SL-2				
1	<i>Parameter</i>	<i>Symbol/Formula</i>		
2	Total solids processed, lb/yr	m1	8,477,490	= 0.79 * 1225 lb/hr * 8760 hrs
3	VOC used in foaming process, lb/yr	m2	2,253,510	= 0.21 * 1225 lb/hr * 8760 hrs
4	VOC used for start-ups, lb/yr	E1	0	
5	Product SGO, lb/yr	m3	7,036,097	18% scrap rate
6	Solids content of start-up scrap, lb/yr	m5	0	
7	Primary Extrusion			
8	VOC weight fraction in extruded foam, %	w1	1.20%	
9	Solids content of product SGO, lb/yr	m6 = (1 - w1) x m3	6,951,664	
10	Solids content of extrusion scrap, lb/yr	m7 = m1 - m5 - m6	1,525,826	
11	Amount of VOC in extruded foam, lb/yr	m8 = (w1 / (1 - w1)) x (m1 - m5)	102,965	
12	Amount of VOC available for control, lb/yr	m9 = m2 - m8	2,150,545	
13	Collection efficiency, %	ce1	100%	
14	Reclaim Process			
15	Amount of VOC in extrusion scrap, lb/yr	m14 = (w1 / (1 - w1)) x m7	18,532	
16	Amount of VOC available for control, lb/yr	m16 = m14	18,532	
17	Collection efficiency, %	ce4	98%	
18	Emissions			
19	Total amount of VOC available for control, lb/yr	m17 = m9 + m16	2,169,077	Uncontrolled VOC emissions
20	Composite collection efficiency, %	ce = (m9 x ce1 + m16 x ce4) / m17	99.98%	
21	Amount of VOC not collected, lb/yr	E2 = m17 x (1 - ce)	371	
22	Destruction efficiency, %	de	98.2%	
23	Amount of VOC destroyed, lb/yr	m18 = (m17 - E2) x de	2,129,669	
24	Stack emissions, lb/yr	E3 = m17 - E2 - m18	39,037	
25	VOC wt fr in finished goods @ 14 days, %	w4	0.16%	
26	Amount of VOC released in the warehouse, lb/yr	E4 = (w1 / (1 - w1) - w4 / (1 - w4)) x m6	73,293	
27	Total emissions, lbs/yr	E = E1 + E2 + E3 + E4	112,700	
28	Total emissions, tons/yr	E = (E1 + E2 + E3 + E4)/2000	56.35	

Appendix A: Emission Calculations				
	Company Name:	Pregis Innovative Packaging, Inc.		
	Address City IN Zip:	1411 Pidco Drive, Plymouth, Indiana 46563		
	Operating Permit No.:	T099-17908-00028		
	Plt ID:	099-00028		
	Reviewer:	Trish Earls		
	Plymouth Mass Balance - Extruded Foam Plank - PL-1 and PL-3			
1	<i>Parameter</i>	<i>Symbol/Formula</i>		
2	Total solids processed, lb/yr	m1	9,926,175	= 0.925 * 1225 lb/hr * 8760 hrs
3	VOC used in foaming process, lb/yr	m2	804,825	= 0.075 * 1225 lb/hr * 8760 hrs
4	VOC used for start-ups, lb/yr	E1	0	
5	Product SGO, lb/yr	m3	6,893,177	35% scrap rate
6	Solids content of start-up scrap, lb/yr	m5	0	
7	Primary Extrusion			
8	VOC weight fraction in extruded foam, %	w1	6.400%	
9	Solids content of product SGO, lb/yr	$m6 = (1 - w1) \times m3$	6,452,014	
10	Solids content of extrusion scrap, lb/yr	$m7 = m1 - m5 - m6$	3,474,161	
11	Amount of VOC in extruded foam, lb/yr	$m8 = (w1 / (1 - w1)) \times (m1 - m5)$	678,713	
12	Amount of VOC available for control, lb/yr	$m9 = m2 - m8$	126,112	
13	Collection efficiency, %	ce1	100%	
14	WIP/Aging			
15	VOC weight fraction in aged foam, %	w2	5.000%	
16	Amount of VOC available for control, lb/yr	$m10 = (w1 / (1 - w1) - w2 / (1 - w2)) \times m6$	101,584	
17	Collection efficiency, %	ce2	100%	
18	Reclaim Process			
19	Amount of VOC in extrusion scrap, lb/yr	$m14 = (w1 / (1 - w1)) \times m7$	237,549	
20	Amount of VOC available for control, lb/yr	$m16 = m14$	237,549	
21	Collection efficiency, %	ce4	98%	
22	Emissions			
23	Total amount of VOC available for control, lb/yr	$m17 = m9 + m10 + m16$	465,245	Uncontrolled VOC emissions
24	Composite collection efficiency, %	$ce = (m9 \times ce1 + m10 \times ce2 + m16 \times ce4) / m17$	99.0%	
25	Amount of VOC not collected, lb/yr	$E2 = m17 \times (1 - ce)$	4,751	
26	Destruction efficiency, %	de	98.2%	
27	Amount of VOC destroyed, lb/yr	$m18 = (m17 - E2) \times de$	452,205	
28	Stack emissions, lb/yr	$E3 = m17 - E2 - m18$	8,289	
29	Total emissions, lb/yr	$E = E1 + E2 + E3$	13,040	
30	Total emissions, tons/yr	$E = (E1 + E2 + E3) / 2000$	6.52	

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

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Permit Number: T099-17908-00028
Pit ID: 099-00028
Reviewer: Trish Earls

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.3

46.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.04	0.18	0.01	2.30	0.13	1.94

*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 next page for HAPs emissions calculations.

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

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Permit Number: T099-17908-00028
Pit ID: 099-00028
Reviewer: Trish Earls

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.838E-05	2.765E-05	1.728E-03	4.147E-02	7.833E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.152E-05	2.534E-05	3.225E-05	8.755E-06	4.838E-05

Methodology is the same as previous page.

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